ELKMONT:

A NATIONAL PARK SERVICE COMMUNITY IN LIMBO: CONSERVATION VERSUS PRESERVATION

by

ETHIEL BENJAMIN GARLINGTON

(Under the Direction of John C. Waters)

ABSTRACT

Elkmont, located within the Great Smoky National Park, has a social history dating back to the mid nineteenth century and buildings that represent the evolution of the community.

The National Park Service (NPS), the federal government's protector of the natural and built resources, struggles to maintain an appropriate balance between conservation and preservation. This thesis considers Elkmont as an example of the NPS struggle and proposes solutions for the future of the Elkmont National Register Historic District.

INDEX WORDS: Conservation, Preservation, National Park Service,

Great Smoky Mountain National Park, Elkmont

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B.A., Presbyterian College, 2001

A Thesis Submitted to the Graduate Faculty of the University of Georgia in Partial Fulfillment of Requirements for the Degree

MASTER OF HISTORIC PRESERVATION

ATHENS, GEORGIA

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ETHIEL BENJAMIN GARLINGTON

Major Professor: John C. Waters

Committee: Wayde Brown

Mary Anne Akers Allen Stovall

Electronic Version Approved:

Maureen Grasso
Dean of the Graduate School
The University of Georgia
December 2004

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CHAPTER I

INTRODUCTION: THIS IS ELKMONT

The National Park Service (NPS) was established by a 1916
Act of Congress which gave the agency authority for, and
responsibility of, managing the federal lands that had been
acquired under the 1906 American Antiquities Act. Originally,
the NPS focused on the scenic treasures of the American West,
but after the 1933 reorganization, the NPS was given the charge
of managing the War Department's holdings. During the remainder
of the twentieth century the NPS evolved into the nation's
protector of natural and built resources. Key legislation made
historic preservation an important part of American culture in
tandem with the wilderness legislation that continued to protect
areas such as Yellowstone, the Everglades, and the Great Smoky
Mountain National Park (GSMNP), to name a few.

One of the most challenging roles of the NPS is protecting nature and buildings. Conservation and preservation philosophies have both evolved in the last century to become mainstays in American's vocabulary. More importantly, the NPS

National Park Service (Annotated)
http://www.cr.nps.gov/history/hisnps/NPSHistory/timeline_annotated.htm#TOP

is responsible for following and maintaining both schools of thought. During the twentieth century, both philosophies have evolved from individual concepts of protection to citizen-based activism groups. Thus, the beginnings of historic preservation date to the 1850s when the Mount Vernon Ladies Association purchased George Washington's estate. Conservationists look to 1863, when Yosemite Valley was secured as the nation's first state park as the beginnings of conservation.²

In 1903 the first logging took place in Elkmont, Tennessee along the Little River. Three Pennsylvanians moved to East

Tennessee to capitalize on the uncut hardwoods and established a company town and railroad in the area. The more accessible the area became, the more visitors found their way to Elkmont. By 1910, visitors from Knoxville, Tennessee were frequenting the area via the open-air rail car on the Little River Railroad

Company Line. Eventually, some of the regular tourists formed the Appalachian Club, which organized hunting and fishing excursions. The AC bought land from Colonel Townsend, one of the original Pennsylvanian entrepreneurs, and built a clubhouse and some individual cabins. Subsequently, several Club members

² Conservation Study Institute, "Conservation Timeline: 1801-1900"

http://www.nps.gov/mabi/csi/learning/1801.htm

bought logging cabins and made modifications to the cabins to suit their needs.³

Elkmont quickly became a destination for other Knoxvillians and people across the southeast. More cabins were built as the logging potential diminished. In the 1920s East Tennesseans, many of whom had cabins in Elkmont, started pushing for creation of a National Park in the Southern Appalachians. After about two decades of land acquisition and fundraising, the GSMNP was dedicated in 1945. Owners of Elkmont cabins were allowed to keep their properties in a lifetime lease agreement with the NPS. Over the next decades, more extensions would be arranged. Finally, in 1993 all leases had expired, including the Wonderland Hotel, the largest structure in Elkmont, which served as a hotel and restaurant until it was closed by the NPS.

According to the 1982 General Management Plan (GMP), after the Elkmont lease expired, all structures would be razed so the area could return to its natural state. However, in 1994 the Elkmont area was placed on the National Register of Historic Places and the Elkmont Historic District (EHD) became subject to additional government regulations before it could be razed. For example, once the EHD was created, the Tennessee State Historic

³ National Register Nomination Form, 1994. On file at TN SHPO/Tennessee Historical Commission, Department of Natural Resources, Nashville, TN. Section 8, P. 30.

National Park Service website http://www.elkmont-gmpa-ea.com/purposeandneed.html

Preservation Office (TNSHPO) had to be consulted on any demolition plans. After several years of disagreements, the TNSHPO and the NPS organized a plan for the future of Elkmont.⁵

This plan stipulated, June 2005, as the date the NPS must have a decision for Elkmont and the treatment for the historic district. An Environmental Impact Study (EIS) has been undertaken and public comments have been accepted. Since families have such a close connection with the cabins, many people are fighting to save the buildings from demolition. On the other hand, many people disagree with private use in a National Park and would like to see the area cleared and returned to its natural setting. 6

Somehow the NPS must make an informed decision that will be appropriate for both the historic integrity and the sensitive natural habitat in Elkmont. The following thesis will discuss the evolution of conservation and preservation philosophies, the conflicting responsibilities of the NPS, the evolution of the Elkmont area, and the recommendations for the future use and treatment of Elkmont. In essence, the project is an exercise in illustrating the NPS's policies on the competing philosophies of conservation and preservation while using Elkmont as a timely and precise example of the internal NPS struggle.

⁵ Ibid

⁶ Sierra Club website
http://www.sierraclub.org/GreatSmokyMountains/elkmont.asp

On the international scene, Canada offers an interesting example of another approach to the management of historic and ecological properties. Parks Canada has divided their system into two areas. One, the National Parks of Canada, manages the natural environments of the system. The other, the national Historic Sites of Canada, manages the culturally significant areas. Although the two subjects are managed separately, each park considers the integrity of all resources. According to the National Parks of Canada website, "ecological integrity should be assessed with an understanding of the regional evolutionary and historic context that has shaped the system." Natural and Built resources must be managed as a whole system, not as independent philosophies.

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⁷ National Parks of Canada-Ecological Integrity
http://www.pc.gc.ca/progs/np-pn/eco_integ/index_e.asp

CHAPTER II

EVOLVING PHILOSOPHIES OF CONSERVATION AND PRESERVATION

The terms "conservation" and "preservation" are relatively new words in the American vocabulary. Although both philosophies have been around for centuries, the words themselves have only recently found a place in regular household dialogue. Conservation is defined by early conservationist writer, WJ McGee, as, "the use of the natural resources for the greatest good of the greatest number for the longest time." In a similar fashion, preservation refers to the protection and use of built resources "for the longest time".

Both philosophies evolved from early American history and in many ways followed the same course of events. In fact, 1626 marks the first legislation designed to protect the natural resources of the Colonial communities. The Plymouth Colony established an ordinance, which limited the number of trees that could be cut in the area. Later, in 1681, the Pennsylvania Colony "required settlers to leave one acre of forest for every five acres cleared, to ensure adequate timber resources for the

⁸ David Cushman Coyle. *Conservation: An American Story of Conflict and Accomplishment*. New Brunswick, New Jersey: Rutgers University Press, 1957. P. vii.

future." Although some limitations were placed on the environment, overall the land was used to its maximum potential without considering the future ramifications. By the American Revolution, more colonists were recognizing the importance of the developed lands they had acquired. The Revolution also sparked interest in history and patriotism but failed to draw attention to preserving the built environment. 10

During the nineteenth century, conservation and preservation became official movements and specific events helped secure the future for both philosophies mainly because of negative occurrences. For instance, after America won her independence, more land was sought to add to the nation's territory. As a result, the federal government claimed land and eventually sold or gave away the land to private individuals. The federal government used the lands as a source of income and did not think of protecting the natural resources. In fact, the abundance of land distribution gave the impression that land was never ending and personal property, rather than an important national resource. Also, since the government still owned vast land territories, they tried to regulate the land. However, many Americans disagreed with this philosophy of land

⁹ Richard M. Highsmith. *Conservation in the United States*, 2nd ed. Chicago, IL: Rand McNally Company, 1969. P. 9.

10 Coy Layne Ballard. *Preservation of Man-Made Resources*.

Athens, GA: University of Georgia, 1976. P. 10.

protection, since it opposed American freedom ideals. 11

Preservation also suffered blows in the nineteenth century because of rapid expansion and development. Most new developments paid no attention to existing structures and the seemingly never-ending supply of natural resources used to build them. 12

On the other hand, conservation and preservation made some progress in the nineteenth century. For instance, the National and State Parks Movement began in the mid 1800s. The first state park was established in June 1863 in Yosemite Valley, California. The goal was to protect a beautiful natural setting for all people to enjoy forever. In the same year, Frederick Law Olmstead, acclaimed landscape architect, completed Central Park in New York City. The park was an obvious victory for conservationists and set the stage for the parks movement. A preservation milestone took place in 1858, when the Mount Vernon Ladies' Association acquired the home and land of George Washington in the first privately funded preservation transaction. Then in 1863, the federal government recognized the natural significance and established the first national park in Yellowstone. Fortunately, the built resources were also

¹¹ Ibid

¹² Coy Layne Ballard. Preservation of Man-Made Resources. Athens, GA: University of Georgia, 1976. P. 14.

Conservation Study Institute, "Conservation Timeline: 1801-1900" http://www.nps.gov/mabi/csi/learning/1801.htm

protected in these parks, thus creating a harmonious history for conservation and preservation. 14

In the 1890s, John Muir established the Sierra Club and the Chickamauga battlefield was established as the "first military park." By the twentieth century, conservation and preservation ideals were mainstays for the American public. Politically, in 1901, Theodore Roosevelt took office as President and would take conservation to higher levels by seeking federal protection of lands (see figure 1). Roosevelt helped establish Wildlife Refuge areas in Florida on Pelican Island, but also pushed the American Antiquities Act of 1906, which protected archeological resources of the southwest. By 1910, Americans realized the importance of architectural significance and the realization that protection of buildings could not be restricted to making them all house museums. Rather, historic buildings must remain in use. 16

¹⁴ Coy Layne Ballard. *Preservation of Man-Made Resources*. Athens, GA: University of Georgia, 1976. P. 15.

John C. Waters. Maintaining A Sense of Place: A Citizen's Guide to Community Preservation. Athens, GA: University of Georgia, 1983. P. 9.

John C. Waters. Maintaining A Sense of Place: A Citizen's Guide to Community Preservation. Athens, GA: University of Georgia, 1983. P. 3.



Figure 1 1903 Photograph of John Muir, Theodore Roosevelt, and others in Yosemite Valley. Photograph from http://www.theodoreroosevelt.org/life/biopictures.htm

Perhaps the most important event for conservation and preservation took place in 1916 when the NPS was established. The agency was charged with safeguarding the historic and natural resources of the United States and its efforts will be discussed in more detail later. In 1927, Colonial Williamsburg became the first example of the outdoor museum after Reverend Dr. D.A.R. Goodwin and John D. Rockefeller, Jr. (see Figure 2). For the first time, an entire community became the object of preservation. A few years later, Charleston established the nation's first historic district by passing an ordinance to

"preserve and protect the historic places and areas in the old Charleston Historic District."¹⁷ This ordinance represents another phase in the evolution of preservation by establishing that historic areas could be protected by local ordinances.

Also, in 1933 research and documentation became an important step for preserving buildings and districts. Additionally, for new development in historic areas, design professionals were consulted for compatibility concerns.¹⁸



Figure 2 Rev. Dr. D.A.R Goodwin and John D. Rockefeller discuss the restoration of Williamsburg in 1926. Photograph from http://www.history.org/foundation/

17 Conservation Study Institute, "Conservation Timeline: 1801-1900" http://www.nps.gov/mabi/csi/learning/1801.htm

¹⁸ John C. Waters. *Preservation Primer: A Reader for HIPR 6000*, Athens, GA: By the author, 2000. Section III-The Evolution of Preservation Philosophy, P. 1.

In the same year, Franklin Delano Roosevelt became

President and used conservation measures to alleviate the Great

Depression. Roosevelt's New Deal revolved around the protection

and use of America's natural resources. After the Dust Bowl

tragedy in the plains, the New Deal included legislation to

limit soil erosion. More importantly, organizations were

established to undertake the plans. The Tennessee Valley

Authority (TVA), the Civilian Conservation Corps, and the Soil

Conservation Service are only a few of these groups (see Figure

3).



Figure 3 Completed in November 1944, Fontana Dam was one of TVA's many notable accomplishments. Photograph from http://www.tva.com/heritage/fontana/index.htm

The second half of the twentieth century focused on the activism and public awareness of conservation and preservation.

For instance, in 1949 the National Trust for Historic

Preservation was chartered by Congress to help protect

landscapes, buildings, and communities. 19 Also, in 1951 the
Nature Conservancy was incorporated and took the place of the
Ecologist's Union. During these years, conservation began to
address the total environment. Citizens noted the effects of
urbanization on the environment. The federal government also
recognized the problems and made some advancements. In 1964 the
Wilderness Act protected fifty-four wilderness areas and allowed
for the addition of future areas. 20 Ecology also resurfaced as
an important role in keeping the public involved in
conservation. For instance, in the spring of 1970, Earth Day
made the public realize the individual's role in the environment
and solidified the conservation movement as an important part of
American life and health.

As organizations were being formed for conservation and preservation interests the two philosophies began to part ways and would eventually compete for protection of their respective subjects. Since the NPS is charged with protecting both natural and built resources, no other entity better exemplifies the competing philosophies.

¹⁹ Conservation Study Institute, "Conservation Timeline: 1901-2000" http://www.nps.gov/mabi/csi/learning/1801.htm
²⁰ Coy Layne Ballard. *Preservation of Man-Made Resources*.
Athens, GA: University of Georgia, 1976. P. 54.

CHAPTER III

NATIONAL PARK SERVICE OVERVIEW

NPS History

In 1872, the Yellowstone National Park Act created America's and the world's, first "national park". The land was set aside for "the benefit and enjoyment of the people (see Figure 4)."²¹ Yellowstone laid the groundwork for parks of the future and led to other park oriented federal legislation. For instance, Theodore Roosevelt endorsed the Antiquities Act of 1906, which was a response to the despoliation of archeological sites in the American southwest. The Act gave the President the power to declare federally owned properties national monuments and also established a standard for archeological excavations on government lands. Furthermore, the Act help spark legislation, sometimes referred to as the Organic Act of 1916, which officially established the NPS to manage the multitude of properties acquired under the Antiquities Act.²² Under the

²¹ National Park System (Annotated)

http://www.cr.nps.gov/history/hisnps/NPSHistory/timeline_annotat
ed.htm#TOP

²² Ibid

Department of the Interior, the NPS was charged with the daunting task of managing the properties.



Figure 4 Early automobile tourists in Yellowstone National Park.

Photograph from

http://www.nps.gov/yell/slidefile/history/1919_1945/images/16350.jpg

Perhaps the most important year for the NPS, 1933, marked a reorganization plan, which added the War Department's holdings and national monuments to the NPS, formerly held by the United States Forest Service. In the next few years, historic preservation was recognized as a priority and in 1935, the Preservation of Historic Sites Act passed. This 1935 Act defined the NPS's historic preservation role and specifically authorized "a national policy to preserve for public use

historic sites, buildings, and objects of national importance."²³
Over the next few decades, several other Acts were passed,
including the Wilderness Act of 1964, which reserved lands as
unimpaired wilderness areas. In addition, the National Historic
Preservation Act of 1966 ensured the future of historical parks,
by placing them on the National Register of Historic Places.
Also, in 1998 the National Park Omnibus Management Act focused
on the financial burdens of the national parks and reworked the
process by which lands are considered for national park status.²⁴

The NPS has the responsibility to maintain properties that are significant because of their natural contributions or their cultural contributions, and those properties that include both natural and historic resources. As a result, conflicts arise between the conservation of the natural resources and the preservation of the historic resources and cause disagreements on management policies and prioritization for land use within public lands.

Nature and the NPS

Throughout the history of the National Park system, people have debated the human impact on the natural environments that are meant to be preserved for the public use. Consequently, the

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²³ Ibid

²⁴ Ibid

dilemma is not easily solved and continues to be a sensitive issue. From an article in the Regional Review, dating from March 1940, a biologist examined the concept of the wilderness area and the recreational uses of the National Parks. Clifford Presnall, Assistant Chief of the Wildlife Division in Washington, in his article, "Human Values First", points out the complexities of maintaining a park's "primitive wilderness", which he concludes is synonymous with national parks. However, he notes that the goals of the NPS to allow public enjoyment and use of the areas would not be possible if the parks were to remain a truly "primitive wilderness." Also, he addresses the different degrees of conservation practiced by the NPS.

For instance, the Swift Creek Recreational Demonstration
Area in Virginia is protected as a recreation area, and is
appropriately maintained for that purpose (see Figure 5). Of
course, many environmentalists have argued that the forest
should be able to return to its "natural primitive conditions."
As a result, the area's open land to forested land ratio is
dramatically changing, which is reducing the maximum yield of
recreational opportunities. Presnall claims a 30:70 open-toforested ratio is prime for the best recreational use of land
compared with the protection of the natural environment. Of
course, Presnall also notes the significance of wilderness

areas, but stresses the need for recreational parks.²⁵ Although the article was written more than half a century ago, the same problems are currently facing National and State parks across the country.



Figure 5 Children collecting butterflies in Swift Creek Recreational Demonstration Area. Photograph taken from Clifford article.

In a more recent article, "National Park Wilderness:

Protecting What's Left", Jane Braxton Little discusses the 1964

Wilderness Act. The Act is meant to control wilderness areas of
the NPS, even more than the former protection measures. In
effect, lands that are part of the National Wilderness

Preservation System are protected from "building roads, dams,
and permanent structures; cutting timber; and using motorized

vehicles and equipment." According to the article, the Act was
passed against the wishes of the then Park Superintendent. She
concludes as a result, Superintendents have not made an effort

²⁵ Clifford Presnall, "Human Values First", Regional Review, volume IV, No. 3, March 1940.

²⁶ Jane Braxton Little, "National Park Wilderness: Protecting What's Left", Wilderness, Winter 2000: 42.

to register Parklands in the Wilderness System. Little continues her complaints by quoting an early Superintendent who said, "public access by all means possible." 27 She believes the National Park's wilderness contributions are being subjected to stresses like helicopter tours, timber cutting, and tourism, just to name a few. For instance, in Death Valley National Park, sand boarders are allowed to surf the sand dunes, which is destroying the dunes. Also, recreational vehicles, such as jet skis and off-road vehicles are spoiling places like the Everglades and Cumberland Island. 28 Unfortunately, the diversity of the NPS goals has supporters battling over the uses of Parks and the approach of the NPS. Like the Presnall argument, the wilderness lands of the NPS are caught in the middle of a century-old debate. Although the public should have access to the Parks, some control must be in place to protect the precious natural resources. In Yosemite and the Grand Canyon National Parks, Directors have plans to limit tourism and the recent ban on snowmobiles reveals a sign of change in management policies. 29

Fran Mainella is the first female director of the NPS. In the summer of 2001 she was sworn into office backed by a long list of supporters including park rangers, environmentalists, and even outdoor recreation groups. As the former director of

 $^{^{27}\,\}mathrm{Ibid}$

 $^{^{28}}$ Ibid

²⁹ Thid

the Florida Park System she helped the Everglades National Park recover from its major human impact struggles. Some critics argue Mainella has a "Disney" approach to parks since she admires the record number of visitors that Disney World can accommodate. 30 She faces the same debate described in the aforementioned 1940 article cited above. On the one hand, Mainella respects the environmental contributions of the parks, but on the other hand, she hopes to expand the commercial presence in the park system. 31 Unfortunately, the NPS, like other government agencies, has never been properly funded and, as a result, a backlog of problems has developed. In Florida, Mainella was able to raise \$3 billion to purchase land buffers around the parks to further resist the impact of outside development. Since she has inherited the debts of the NPS, she could be able to create a similar fundraising campaign for the NPS. 32 In summary, the financial woes of the NPS are a main consideration for NPS policies.

Muir Woods in the San Francisco Bay Area is an excellent case study for a National Park that has evolved to accommodate people and nature (see Figure 6). The Park is "the most crowded natural unit per acre in the system", so it provides an

³⁰ Todd Wilkinson, "Parks face Big Test of Preservation v. Use", Christian Science Monitor, volume 92, issue 147, 25 June 2001:

 $^{^{31}}$ Ibid

 $^{^{32}}$ Ibid

exaggerated look at conservation versus public exposure. 33 The National Monument was the tenth to be established after the passing of the Antiquities Act. In the early years of the park, San Francisco visitors had limited access as a result of the geographic sitting of the Monument. City residents could only enjoy the Woods by traveling via ferries, which had limited capacity and limited schedules. Ironically though, in the 1920s the visitor impact was already apparent on the land in the form of littering and campfires in trees, among other issues. Park's staff took a proactive approach and limited activities in an effort to reduce the time each visitor spent in Muir Woods. In 1937, the Golden Gate Bridge opened, which resulted in more visitors and more negative impact. As a reaction, camping was prohibited and picnic tables and other amenities were removed. Eventually, the main trail was paved and parking was limited to outside the forest. Of course, problems remain today, but without the drastic measures by the park, Muir Woods would have lost its pristine footing in the urban core of six million people. 34 The natural resources of national parks are important, but many of the built resources are equally significant to the country's heritage and unfortunately they are equally vulnerable to visitor impact problems.

³³ Larry M. Dilsaver. "Preservation Choices at Muir Woods", Geographical Review, volume 84, issue 3, July 1994: 290.

³⁴ Thid



Figure 6 Redwoods of Muir Woods stand high above park road. Photograph from http://www.sftours.com/marin_tours.html

Buildings and the NPS

National Parks surprisingly are home to many buildings.

Buildings serve as offices, bathrooms, cafeterias, gift shops, historic landmarks, and storage, just to name a few. In most of the popular parks, concessionaires are permitted to use buildings and in some cases they have built new structures to serve their particular needs. The NPS allows private concessionaires in the Park buildings and charges a minimal rental fee and a small percentage of the profits. Ironically, the backlog of NPS maintenance stems from building disrepair,

many of which are occupied by private companies. According to a report released in the summer of 2003, the NPS had undertaken 900 projects in the past two years and 325 of those were for buildings. Buildings are victims of human impact and budget constraints, just as the natural environment suffers.

On the other hand, the NPS still acquires and erects structures to add to the NPS repertoire of attractions. For example, Thurmond, West Virginia represents a unique railroading community that has long since been abandoned. The Park has plans to restore several of the buildings, but has not secured ownership of the most significant properties. The current owner, CSX Railroads, still operates the rail line that bisects the town and is reluctant to have visitors in close proximity to the functioning line. The NPS is developing an interpretive plan to combat the issue and would like to procure the buildings soon, since the buildings are declining rapidly. For instance, the external portion of the engine house, or roundhouse, is "basically shot" and the NPS fears the house will disappear before acquisition can take place. 36 Amazingly, the money has already been secured for the restoration work, but not for the initial purchase. Another important building, the passenger

issue 7/8, July/August 1991: 31.

³⁵ "Park Service Maintenance Log is Slowly Reduced", Engineering-News Record, volume 251, issue 3, 21 July 2003: 17.

³⁶ Yvette LaPierre, "Back on Track", National Parks, volume 66,

depot, is vital to the interpretation of the area since it is the first building that visitors would see when they approached by train. The depot presently has one CSX office, but is in need of repair. Unfortunately, any interpretation without the buildings would be limited to photo exhibits, which are not as desirable or effective.³⁷ Clearly, buildings are critical to a comprehensive interpretation of historic sites.

In fact, many National Parks revolve entirely around the historic buildings on the property. For instance, a new addition to the NPS features six dilapidated buildings that constitute Bathhouse Row in the Hot Springs National Park in Arkansas (see Figure 7). The line of hot spring spas was formerly listed on the National Trust for Historic Preservation's annual most endangered List. The NPS is still hoping to find funding and appropriate uses for the important buildings. Some people have suggested private developers each adopting a building and funding the renovations. However, Daniel Carey, the director of the southwest office of the National Trust for Historic Preservation, cautions that the use of private monies should only be tapped if the priorities of the park are not forgotten. Fortunately, before the NPS acquired the buildings they were able to stabilize roofs and slow the degradation process. Also, two of the original bathhouses

³⁷ Ibid

function as spas and serve as an attraction to the area that would spread use demand to the neglected structures. Ideally the strip would be a working model of the original and intended use.³⁸

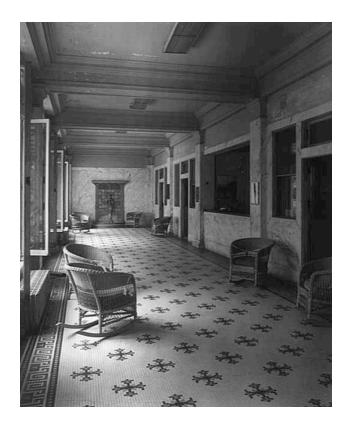


Figure 7 Once the lobby of the Fordyce Bathhouse, now the Visitor's Center for the National Park. Photograph from http://memory.loc.gov/ammem/collections/habs_haer/images/ear28d1.jpg

Historic uses for buildings are only one priority for the NPS. In Hyde Park, New York, a Val-Kill Cottage is being preserved to commemorate the achievements and life of first lady, Eleanor Roosevelt. After the death of her husband, she

³⁸ Jennell Talley, "Lack of Funding Plagues hot Springs", *National Parks*, volume 77, issue 9/10, September/October 2003: 18.

had plans to spend time with her family and friends at her cottage in Hyde Park. Her vacation was cut short by President Harry Truman who recruited her as an ambassador to the United Nations. She had an illustrious life and was deemed by Truman as "First Lady of the World", which led to a bill in 1977 passed by President Jimmy Carter. The bill designated Roosevelt's Hyde Parke cottage as the Eleanor Roosevelt National Historic Site. 40

Unfortunately, money is an underlying theme for any government agency, and private agency, for that matter. As mentioned previously, the NPS is no exception. In fact,

Congress regularly battles over the amount of funding for park allocation. For example, in San Francisco, home of Muir Woods,

Representative Nancy Pelosi pushed a bill that would allocate government monies for the maintenance and operation of the

Presidio Army Base (see Figure 8). The Base will be a brother to Muir Woods in the Golden Gate National recreation Area, which also includes Alcatraz Island. The Base includes 1,500 acres of "historic buildings, wetlands, wild coastal bluffs, and other areas of spectacular scenery in San Francisco", according to

 $^{^{39}}$ Ryan Dougherty, "First Lady of the World", National Parks, volume 77, issue 3/4, March/April 2003: 44. 40 Thid

Pelosi. ⁴¹ The opposition in Congress came from John Duncan, Tennessee Representative, who offered an amendment, which was handily defeated, that would have stripped \$14 million from the project. ⁴² Clearly, the financial burden of the NPS is substantial, but also the support people have for the preservation of important buildings and places is equally substantial.



Figure 8 Former Presidio Army base in San Francisco, CA. Photograph from http://www.nps.gov/prsf/index.htm

Another California example is presently unfolding in Sequoia National Park. The Park boasts that it is the "home to

⁴² Ibid

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⁴¹ "Historic Presidio Joins NPS", *National Parks*, volume 68, issue 9/10, September/October 1994: 16.

several of the oldest and largest trees on earth."43 Unfortunately, the popularity of the Park has had adverse effects on the trees, so the human impact is being reversed. The Park initiated project has already removed 282 buildings, but replacement facilities will be rebuilt on the fringe of the Park, which will have less of a detrimental affect on the natural environment. Also, the Park plans to remove paved roads, power lines, septic lines, and other amenities. Tweed, the chief interpreter for the Park, made the poignant statement, "we are in danger of loving the place to death". 44 justifies the demolition by noting the attraction of the Park. 45 After all, without the trees, visitors will have no reason to visit. As of late, the NPS does not have an umbrella policy for the demolition of buildings on Park properties. Generally, each Park is expected to make educated decisions for their Park, since each circumstance is unique.

Each destination is different and many Parks feature built heritage in harmony with environmental heritage. On the other hand, like the Sequoia example, some Parks cannot survive with both elements. Battlefields are prime examples of buildings dueling with nature. For instance, in 1927 the War Department

⁴³ Daniel B. Wood. "Rangers Begin to Unbuild, Unpave National Parks", *Christian Science Monitor*, volume 93, issue 176, 6 August 2001: 1.

⁴⁴ Ibid

⁴⁵ Ibid

focused on the acquisition of "physical remnants of the battle: earthworks, house sites, and monuments" at the Chancellorsville, Virginia battlefield. At the time, "it seemed a sane enough assumption that those battlefield landscapes would forever be pristine, tended as they always had been by industrious Virginians." Of course, in hindsight, this was a naïve approach to protecting a national treasure. Instead of remembering the wide-open spaces, the preservation efforts are centered on physical evidence in the area. Ironically, the NPS has already removed "modern farm buildings" from a newly acquired parcel of the field. Even a residence is being demolished next year. Each park has an agenda, which evolves over time. However, in one hundred years people may be curious about the "modern farm buildings and house."

Another battlefield, Antietam, is undergoing a change to return the land to how it would have looked on 17 September 1862, arguably the most significant battle during the Civil War (see Figure 9). The process includes removing roads; restoring farmlands and fencing; and rehabilitating several period

⁴⁶ John Hennessey, "An Earthly Tribute to Stonewall's Genius", Civil War Times Illustrated, volume 38, issue 7, February 2000: 14.

⁴⁷ Ibid

⁴⁸ Ibid

buildings. 49 The object is simple, visitors are visiting a battlefield, and so it should resemble the original scene as closely as possible.



Figure 9 Modern photograph of Bloody Lane at Antietam National Battlefield. Photograph from http://www.nps.gov/anti/photos/Mod_photo22.htm

Other Parks face similar dilemmas with buildings. In Yosemite, the Park Directors have finally reacted to a 1980 general management plan, by removing approximately twenty buildings, so the area can return to its natural "black-oak woodland state." Unfortunately for Yosemite, and other Parks, the natural attraction has fostered inappropriate development. Often, this development occurs outside the Park's boundaries

⁴⁹ "Master Plan Approved for Preserving Antietam National Battlefield", American History Illustrated, volume 27, issue 6, January/February: 8.

⁵⁰ "NPS to Move Buildings from Yosemite Valley", National Parks, volume 64, issue 11/12, November/December 1990: 13.

where the NPS has no jurisdiction, but the negative impact is felt on the sensitive grounds of the Parks. Critics of the Yosemite measures point out the automobile issue that will not be curbed by the recent, return to nature, measures.⁵¹

Conservation versus Preservation

On Cumberland Island, off the coast of Georgia, preservationists are pleased to have an adaptive use for the former home of George Carnegie. The plan calls for an artist's retreat to occupy the house and allows for thirty participants living in the historic quarters and 300 guests for each seasonal special event. For obvious reasons, environmental critics are afraid the traffic will severely impact the natural retreat. Presently, the island does have incompatible buildings, which were grandfathered when the Island became a Wilderness Area. Apparently, the buildings will be phased out over the years. 52 The island epitomizes the clash between preservationists and environmentalists.

In east Tennessee and western North Carolina, the nation's most visited National Park, GSMNP, features a wealth of resources, both natural and built. In fact, the Park's most popular attraction, Cades Cove, sees over two million visitors a

⁵¹ Ibid

⁵² "Arts Center Planned Amid Park Wilderness", *National Parks*, volume 69, issue 5/6, May/June 1995: 14.

year and is an example of the NPS preserving a natural pastoral setting by keeping the fields cleared, but also they maintain the buildings as they would have been in the late nineteenth and early twentieth centuries (see Figure 10). Historically, the area was a Native American destination because of the fertile valley and the abundance of wildlife. By 1850, 132 Euro-American families had made the Cove their home and livelihood. The Cove was cleared for farming and livestock were taken to the surrounding mountain top balds for grazing, which saved the fields for farming. The community was listed on the National Register of Historic Places in 1977 because of its "aggregation of thirty structures at ten sites (the largest such collection in the United States) representing the early settlement and vernacular architecture of the Smoky Mountain region."⁵³

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⁵³ National Park Service website http://www.cadescoveopp.com/backgrnd.htm

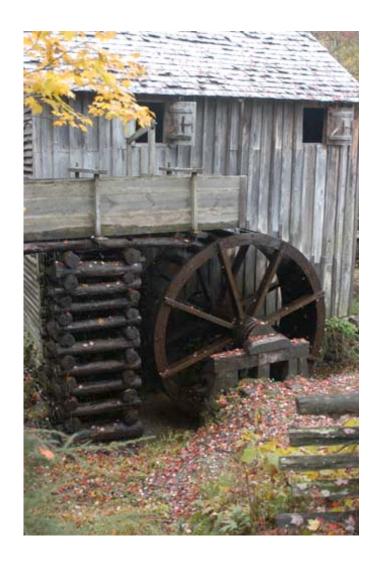


Figure 10 Cades Cove Grist Mill in the GSMNP. Photograph from digital-memphis.com/ Smokies%20Gallery/

Like many of the aforementioned Parks, Cades Cove and the GSMNP are concerned with the visitor impact on the delicate areas. In fact, the number one activity of Cades Cove visitors is touring the ten-mile loop road in vehicles. As a reaction, the NPS has made some changes to management policies in the Cades Cove area of the park. Cattle have been removed from the fields, which had led to high levels of silt in the nearby

Abrams Creek. Also, the Cades Cove Opportunities Plan was initiated in an effort to find solutions for long-term management issues. The main areas of interest from the 1998 Access Issues at Cades Cove include:

- 1. scenic beauty and sweeping vistas of Cades Cove
- 2. importance of Cades Cove's historic setting and representation of Smoky Mountain culture
- 3. need to protect and enjoy wildlife
- 4. importance of the cove as a place to recreate, socialize, be inspired or educated⁵⁴

Cades Cove is a destination for cultural and natural Tourists and must accommodate and respect all fields of interest. Here one can see the ultimate contradiction of the National Park Service philosophies, which must oversee environmental and built resource management. The focus of this thesis, Elkmont, also in the GSMNP, is another prime example of the conservation versus preservation struggle. How should the NPS manage historic properties when they are located in a sacred natural environment?

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⁵⁴ Ibid

CHAPTER IV

HISTORY OF EAST TENNESSEE AND THE ELKMONT AREA

East Tennessee

In the prehistory of East Tennessee, the Cherokee Indian nation claimed the region as their hunting grounds. The Tennessee River valley provides fertile land for agriculture and prime habitat for wild animals. Spanish settlers were the first Europeans in the region and in the 1560s Juan Pardo erected several forts in the East Tennessee region. Eventually the forts were abandoned and the Spanish seemed to show no interest in colonizing the area. Unfortunately for the Native Americans, the Spanish brought diseases before they left the area that severely reduced the Native population. As a result, the remaining peoples consolidated their communities to create more powerful settlements. By the American Revolution, 1775-1783, the Native Americans had adopted many cultural attributes of the settlers and even lived in log cabins. 55

English settlers would eventually be the primary residents in the area. In 1673, two English explorers, James Needham and

⁵⁵ Encarta Online Encyclopedia
http://encarta.msn.com/encyclopedia_761561000_6/Tennessee_(state).html

Gabriel Arthur, brought a group over the Appalachian Mountains from Virginia. More English fur traders moved to the area from Virginia and Carolina for a share of the Native American trading market. French settlers also traveled to the area in search of the fur business. Eventually, the French and Indian War, 1754-1763, erupted in the region. The Chickasaw and Cherokee tribes fought against Britain, but the Cherokees also attacked British troops at Fort Loudon. The French eventually surrendered the war and in 1763 the Treaty of Paris was made which gave the British all land east of the Mississippi River, including the area that would become Tennessee, but not including New Orleans. 56

The British King issued a proclamation in 1763 prohibiting any white settlers in the land west of the Appalachian Mountains. Of course, Virginians and Carolinians disregarded the proclamation and settled along the Houston and Nolichucky Rivers. After a few years, they established the Watauga Association to govern themselves and eventually adopted a constitution, which was the first west of the Appalachians. After the American Revolution, North Carolina ceded the Tennessee region to the United States. People in East Tennessee made plans for their new state, but the Congress rejected the proposal. Finally, on 1 June 1796 Tennessee became part of the

⁵⁶ Ibid

United States of America and the capital was set up in Knoxville, which is in east Tennessee.⁵⁷

During the nineteenth century, east Tennessee continued to thrive and after lands were acquired from Native Americans, more white settlers moved to the area. Most settlers survived on subsistence farms in the rich valleys of the foothills. Also, during the latter half of the century, mining and manufacturing became an important source of revenue for the region. In fact, by 1860, Tennessee ranked third in iron mining and manufacturing production. Before the Civil War, less than ten percent of Tennessee's slaves lived in the eastern counties. In fact, Tennessee did not support initial proposals of secession, but on 8 June 1861 they became the last state to secede. East Tennesseans tried to form an independent state to remain with the Union, but were unsuccessful. Since the state was a border state they saw more battles than any state, except for Virginia. As the War ended, Tennessee became the first state to be readmitted to the Union. During Reconstruction, northerners brought their money to invest in Knoxville and Chattanooga, where industries thrived. 58

The newfound wealth led to other developments in the twentieth Century. During the Great Depression, TVA was

⁵⁷ Ibid

⁵⁸ Ibid

established as part of the New Deal. The TVA used the river resources to produce electricity for the entire southeast region. Dams were built around the state, especially in east Tennessee, where recreational activities continued to grow with the newly formed lakes. The beauty of the area would also invite the future GSMNP and many state parks. Also, during the World War II years, Oak Ridge National Laboratories were set up in East Tennessee for Manhattan project scientists to conduct research for the atomic bomb. 59

East Tennessee has a unique and lengthy history that set the stage for the unique and lengthy history of Elkmont.

Logging Community

Situated in the Southern Appalachian Mountains, Elkmont is a small community with a human history dating back to Native Americans and early European settlers. In fact, in 1540, Hernando De Soto was the first European to come across the Smoky Mountains and, later, settlers migrated from the Carolinas into the area. 60 East Tennessee and western North Carolina proved to be a plentiful source of natural resources including quality farmland, abundant fishing and hunting, and "1500 species of

⁵⁹ Ibid

⁶⁰ National Register Nomination Form, 1994. On file at TN SHPO/Tennessee Historical Commission, Department of Natural Resources, Nashville, TN. Section 8, P. 30.

native plants."⁶¹ The nineteenth century marked the construction of several homes in the area and some crude amenities. More specifically, Mr. Trentham, an early property owner and settler from South Carolina, built a sawmill, a gristmill, and a "power plant" along Jakes Creek, which runs through Elkmont, as does the Little River. The forests provided enormous old growth yellow poplars, chestnuts and basswood, just to name a few.⁶²

Around the end of the nineteenth century, most of the prized hardwoods had already been logged in the eastern United States. However, the southern Appalachians had not been harvested and proved to be an abundant source of lumber. The opportunity for logging in the Smoky Mountains attracted three businessmen from Pennsylvania to the area. Colonel W.B.

Townsend, J.W. Wrigley, and F.H. McCormick bought approximately 80,000 acres in the area and started the Little River Lumber Company (LRLC). Townsend had previously owned a lumber company in Pennsylvania and two railroad companies in the northeast (see Figure 11). He and his associates saw the potential in the Southern Appalachians and brought their entrepreneurship. The LRLC mill was completed in 1903 and the Point Tang Post Office was renamed Townsend, situated in Sevier County outside the Park

61 Ibid

⁶² Ibid

boundary. More importantly, in 1903, logging was initiated in ${\rm Elkmont.}^{63}$



Figure 11 Col. Wilson B. Townsend Photograph from Bible Journal article.

Little River Lumber Company's most significant obstacle was traversing the mountainous terrain and removing the lumber efficiently. Since Townsend had previous rail experience, he founded the Little River Railroad to serve the community and the LRLC (see Figure 12). Between 1905 and 1907, the line was built up the East Prong to Elkmont. Now with rail access, more houses were built and a permanent community was established. The new houses were mostly one or two room cottages, as opposed to the earlier log houses built in the 1800s. Also, "set-offs" were

⁶³ Thid

placed in the area by the LRLC. These houses were prefabricated structures that were the size of railroad cars, so they could be picked up and moved on flat bed rail cars when logging towns moved to new locations. Stringtowns, as they were named because of the string of houses, were founded in certain areas to house the loggers and their families. These developments were self sufficient and provided amenities such as a company store, a postal service, and a church. Elkmont was one of the most important logging communities in the Appalachians. Elkmont became a hub for the railroad in 1908 and served as a logging community, and "company town" for the LRLC. St

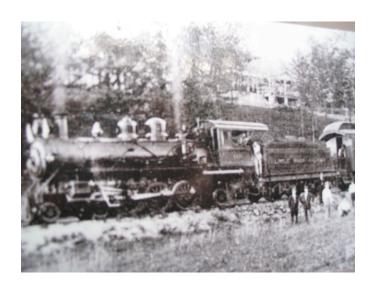


Figure 12 Early photograph of LR Railroad. Photograph on Wonderland Hotel interpretive sign in GSMNP.

⁶⁴ Ibid

⁶⁵ Bible, Robin. "Stringtowns: Early Logging Communities in the Great Smoky Mountains." Forest History Today (Spring 2002) p. 31

Resort Community

In addition to logging needs, the train provided an openair car for visitors from cities such as Knoxville, Tennessee (see Figures 13 and 14). 66 Elkmont was slowly becoming a destination, rather than just a business venture. In fact, in 1907, some of the regular visitors formed the Appalachian Club for hunting and fishing enthusiasts (see Figure 15). The founding members were men from the Knoxville area who bought some parcels from "Uncle Levi" Trentham, the grandson of one of the early pioneer settlers of Elkmont. The Appalachian Club members either built small cottages, or purchased existing cabins and made some improvements. Each member paid \$2.50 per lot. The next year, 1908, Col. Townsend gave land to the Club to build a Clubhouse. The ten-room Clubhouse served three meals a day and had a swinging bridge connecting the front porch to the train station. By 1910, the LRLC had sold the Appalachian Club sixty more acres and granted them hunting and fishing privileges for 40,000 acres "covering the entire water shed of the East Prong of the Little River above Jake's Creek, Sevier County."67

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⁶⁷ National Register Nomination Form, 1994. On file at TN SHPO/Tennessee Historical Commission, Department of Natural Resources, Nashville, TN. Appendix, P. 50

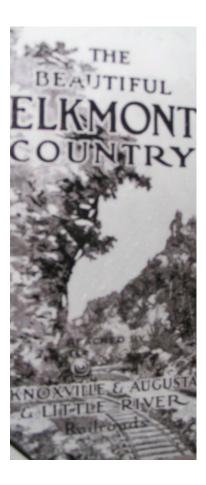


Figure 13 Advertisement for Elkmont on the Knoxville, Augusta, and Little River Rail Lines. Photograph from sign in GSMNP.

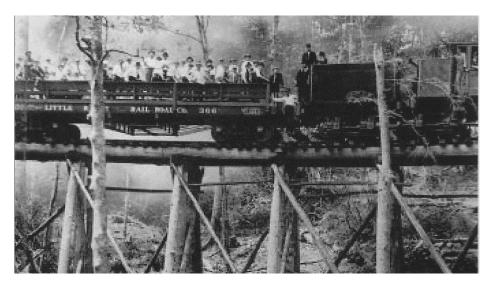


Figure 14 The No. 9 Shay Locomotive on a Knoxville Elks outing. Photograph taken circa 1911-1912 from Bible Journal article.



Figure 15 Appalachian Club train stop. Photograph on GSMNP sign.

Then in 1911, Col. Townsend gave fifty cut acres to Charles B. Carter for the development of the Wonderland Hotel (see Figure 16). The Wonderland Park Company built the hotel for visitors who traveled by train, which was still the main form of access to the area. Although the hotel was a "resort" destination, its modest construction revealed the limitations of development. For instance, much like the small cottages, the Wonderland Hotel used as many local materials as possible to reduce the need for expensive train imported supplies. The grand porches tied the visitors with the natural setting, which was the attraction of the day. The hotel opened on 1 June 1912, but was later sold in 1919 by Carter to a group of Knoxville citizens. The new owners set up a private club in the Hotel and

built the Annex addition, which added fourteen apartment style rooms for members. Interestingly enough, members had the option of building independent cottages, but few took advantage of the option. 68



Figure 16 Early Photograph of the Wonderland Hotel steps and visitors. Photograph found on GSMNP sign.

The National Park

According to the National Register of Historic Places

Nomination form, 1923 marks the first year people began thinking
of a National Park in the Smoky Mountains. Apparently, Mr. and
Mrs. Willie P. Davis had visited U.S. Parks in the west and had
been so impressed that they convinced Colonel David C. Chapman
to lead the charge for a National Park in the Appalachians (see
Figure 17). Chapman took the helm and became Chair of the
Tennessee Park Commission. In Knoxville, the Chamber of

⁶⁸ National Register Nomination Form, 1994. On file at TN SHPO/Tennessee Historical Commission, Department of Natural Resources, Nashville, TN. Section 8, P. 51.

Commerce and Automobile Club took an active role in promoting the Park potential. Also, the Smoky Mountain Conservation

Association was formed to "establish a National Park." Even before this movement, the Appalachian National Park Association had been formed in November 1899. During 1923 and 1924, advocates for the Park raised money and went to the Tennessee Legislature to lobby for state involvement in the land purchase. Also, Dr. Hubert Work, the United States Secretary of Interior, summoned the Southern Appalachian Park Commission to begin scouting land for a potential Park in the Southern Appalachians. The Commission looked at land in Virginia, North Carolina, and Tennessee. After a visit to the Tennessee Mountains, the Commission pushed for a National Park in the Smoky Mountains of East Tennessee, including the last stop on their tour, Elkmont (see Figure 18).

⁶⁹ National Register Nomination Form, 1994. On file at TN SHPO/Tennessee Historical Commission, Department of Natural Resources, Nashville, TN. Appendix, P. 52
⁷⁰ Tbid



Figure 17 Col. David C. Chapman. Photograph from *Journal of the TN Academy of Sciences*, vol. 1, no. 2.



Figure 18 General map of Southern Appalachian region. Map from http://www.knoxville-tn.com/images/easttn.gif

Land acquisition was another hurdle for the Park because the Federal Government did not seem interested in purchasing the land. As a result, in 1925, a Knox County State Legislator, Mrs. W.P. Davis, proposed a bill, in which the State of Tennessee would buy the land for the Park and give it to the U.S. Government. Unfortunately, her bill was defeated, but a second one passed after the Knoxville Chamber of Commerce brought the entire Legislature to the Smoky Mountains. The new bill specified that Knoxville would be responsible for raising one third of the money for the land purchase. Eventually, Tennessee raised \$604,000 for the Park endeavor.⁷¹

Throughout the process, many influential Tennesseans fought for the Park in the Tennessee Mountains. More importantly, many of these players were visitors or landowners in Elkmont. For instance, the Tennessee Governor during the early process was Austin Peay. He owned an Elkmont cabin near the Wonderland Hotel. Also, the media played its role in fighting for the Park. The Knoxville News managing editor, Loye Miller, owned a cabin in Elkmont. Finally, Ben Morton, a member of the Executive Committee of the Southern Appalachian Park Commission, was a cabin owner in Elkmont. Clearly, Elkmont had connections and those connections helped bring the National Park to the area. Later, President Theodore Roosevelt gave Col. and Mrs.

⁷¹ Ibid

Chapman an Elkmont cabin as a sign of appreciation for Chapman's work for the Park proposal. Chapman was deemed the "Founder of the National Park." 72

By 1926, the timber industry had stripped the Elkmont area of its lumber potential and the company town was evacuated.

Before the town was vacated, however, in 1925, Col. Townsend had also begun to push for a National Park in the area. Since the land had been used to its maximum logging limit, Townsend offered to sell the land, which made him the fist "timberland owner of a company to offer lands for sale for a park." Finally in, 1927, the land transaction began, but with a logging stipulation that allowed LRLC to harvest certain trees for the next fifteen years. In 1928, John D. Rockefeller donated \$5 million to the effort for land purchase. The Rockefeller endowment provided the final funds needed to purchase land for the Park. After Col. Townsend's death in 1936, his daughter sold 300,000 acres to the Park for \$3.00 an acre. Little River

⁷² National Register Nomination Form, 1994. On file at TN SHPO/Tennessee Historical Commission, Department of Natural Resources, Nashville, TN. Section Eight, P. 31

⁷³ Robin Bible. "Stringtowns: Early Logging Communities in the Great Smoky Mountains." Forest History Today (Spring 2002) p. 32.

Lumber Company finally ceased operations after the last timber was cut in $1938.^{74}$

During the 1940s, the land evolved from an active logging area, to the slower pace of the National Park Status. changes took place in preparation for the new tenant. Buildings were erected and demolished for the new Park. For instance, in 1940, the Park Administration Building was completed and the following year saw the completion of the Visitor's Center. Since the logging operations were terminated, the 400 miles of railroad were removed and converted to trails for the Park. Logging was not the only industry banned in the new area. After farming was forbidden in the Park, many families had to leave their homes to find new pastures for their livestock and crops. Finally, Franklin Delano Roosevelt dedicated the Great Smoky National Park in 1945 (see Figure 19). In the end, the land was a gift from the people of Tennessee and North Carolina, making it the only National Park in the country that can claim that distinction. 75

⁷⁴ National Register Nomination Form, 1994. On file at TN SHPO/Tennessee Historical Commission, Department of Natural Resources, Nashville, TN. Section Eight, P. 32.
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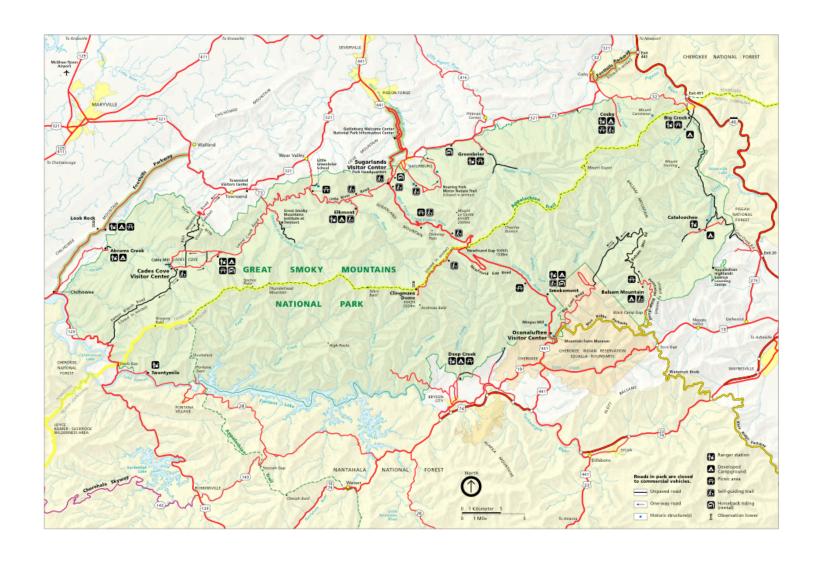


Figure 19 Map of GSMNP boundary and surrounding area. Map from http://www.nps.gov/grsm/pphtml/ACFA653.pdf

Elkmont Cabins

For owners in the Elkmont area, the Park brought a legal change to their property rights. For other landowners in the new National Park, the U.S. government bought the land on a "fee simple basis." However, since Elkmont landowners were prominent Tennesseans, they were able to finagle an exchange that allowed them to have lifetime leases, beginning in 1934, on property within the boundaries of the Park (see Figure 20). They were paid "one-half property value", rather than the full amount, which meant they forfeited their right to the one hundred percent appraisal amount of the property, unlike other residents within the new Park borders. Ironically, some of the Judges and lawyers involved in the land acquisition cases for the Park owned cabins in Elkmont. The original leases were strategically passed on to young family members to maximize the ownership span. 76 In 1952, as a compromise with the Secretary of the Interior, the lifetime leases were replaced with an expiration date of 1972 because Elkmont owners wanted access to electricity (see Figure 21). The 1972 date allowed the power company enough time to make the expansion worthwhile. Then, in 1972, members of

 $^{76}\,\mathrm{National}$ Park Service http://www.elkmont-gmpa-ea.com/faq.pdf

the Elkmont community formed the Elkmont Preservation Commission (EPC) hoping to extend the 1972 terminus. Again, a compromise was forged and a new lease was extended to $1992.^{77}$



Figure 20 Baumann family cabin in the Appalachian Clubhouse area. Photograph taken by author.

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⁷⁷ National Park Service
http://www.elkmont-gmpa-ea.com/purposeandneed.html



Figure 21 Elkmont power transformer, which served the Wonderland Hotel Cabins. Photo taken by author.

1982 General Management Plan

Each National Park is responsible for a General Management Plan (GMP), which covers every aspect of the Park. For the Great Smoky Mountains National Park, the 1982 GMP provided for the "removal of the buildings in the Elkmont area" to "allow the site to revert to wilderness." 78 In accordance with the 1982 GMP, the NPS demolished one of

 $^{^{78}}$ National Register Nomination Form, 1994. On file at TN SHPO/Tennessee Historical Commission, Department of Natural Resources, Nashville, TN. Section Eight, P. 32.

the cabins in 1987 after the ninety-five year-old owner passed away. The original cabin was built in 1895 and featured a stone fireplace and chimney, a water trough that led to the back porch for kitchen use, several outbuildings and beehives, and was marked with a NPS memorial sign after being razed.⁷⁹

The 1982 GMP is the formal document that dictates Elkmont's future. Any new changes must be adopted as amendments to the GMP and therefore must go through an intensive review process before being approved. According to a 10 July 1964 memorandum, the management principles for historical areas should follow three guidelines. First, Resource management "shall be directed toward maintaining, and where necessary, restoring the historical integrity of structures." Second, resource use includes the stipulation that "visitor use of significant natural resources should be encouraged when such use can be accommodated without detriment to historical values." Third, "physical development shall be those features necessary for achieving

⁷⁹ National Register Nomination Form, 1994. On file at TN SHPO/Tennessee Historical Commission, Department of Natural Resources, Nashville, TN. Section Seven, P. 15
⁸⁰ Administrative Policies for Historical Areas of the National Park System. Washington, D.C.: U.S. Government Printing Office, Revised 1973. P. 16
⁸¹ Thid

the management and use objectives."82 Clearly, preservation and maintenance of historic Park resources is a priority for GMPs.

Preservation in Elkmont

Finally, in December 1992, all but three Elkmont leases were in the hands of the NPS. With, the future of Elkmont determined by the 1982 GMP, all buildings were slated for demolition in 1993. However, the Elkmont Historic District (EHD) was listed on the National Register in early 1994 with forty-nine contributing structures (see Figure 22). As a result of Register status, the Tennessee State Historic Preservation Office (TN SHPO) had to be involved in any actions regarding the District.83 Obviously, when the Park sent the TN SHPO the 1982 GMP, the SHPO objected to the removal of the buildings, which put a stop to the plan. A second plan was submitted in 1996 that would have preserved three structures for interpretive use, but the Park would raze the others. Again, the SHPO did not approve the Plan, and recommended recruiting the Advisory Council on Historic Preservation (ACHP) as a mediator between the NPS and the SHPO. Another draft was

 $^{^{82}}$ Ibid

National Park Service http://www.elkmont-gmpa-ea.com/purposeandneed.html

submitted in March 1997, but again rejected, and talks between the NPS and SHPO were terminated. Finally, in 1998-99 the NPS and representatives from GSMNP met to develop another compromise plan. This third plan called for the preservation of seventeen cabins and the Appalachian Clubhouse (see Figure 23). In addition, the NPS gave the GSMNP \$160,000 to stabilize the Clubhouse and the cabins in question. After reviewing the plan, the ACHP decided the latest plan would require "new action and new consultation."84

⁸⁴ Ibid

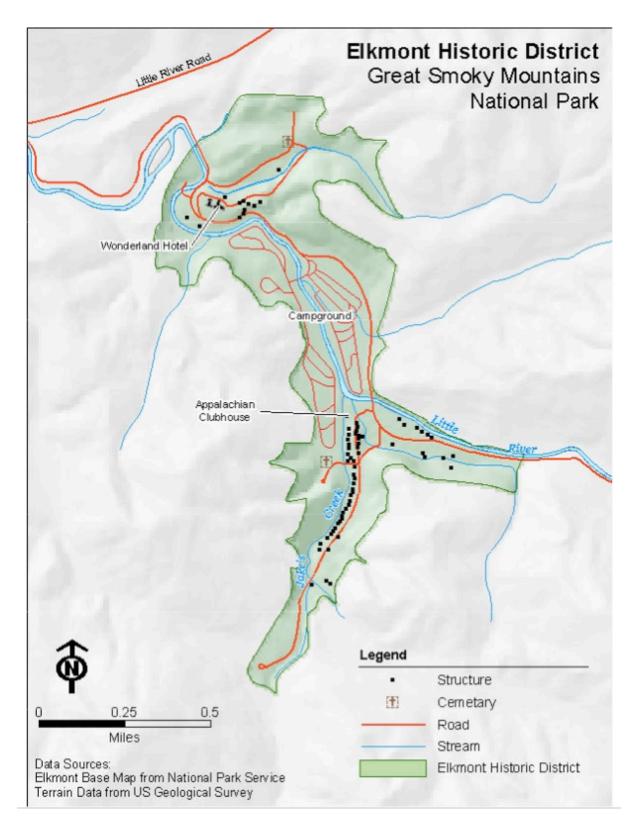


Figure 22 Detailed map of EHD in GSMNP. Map from http://www.nps.gov/grsm/pphtml/DetailedSiteLocation.pdf



Figure 23 Appalachian Clubhouse in Fall 2004. Photograph taken by author.

The "new action and new consultation" would abide by three significant factors. First, the enabling legislation for the GSMNP, which includes the 1916 Organic Act, must be followed for the new action. Essentially, the 1982 GMP met these requirements, but any amendments to the GMP must also comply. Second, any changes would follow the guidelines of the National Environmental Policy Act (NEPA) of 1969.

Third, the process must comply with the National Historic Preservation Act (NHPA) of 1966. More specifically, section 106 of the NHPA requires all government agencies to perform an environmental study on any properties listed in

⁸⁵ Ibid

the Register, or having the potential to be on the Register, before demolishing such buildings. Thus, Elkmont had evolved from a simple logging community to a resort community to a dilapidated group of buildings that became the center of a highly sensitive debate.

CHAPTER V

PRESENT ELKMONT STATUS

The NPS Process

During the almost three year process of the official Elkmont decision process, the NPS and other interested parties have spent, and will spend, money and time ensuring an outcome that best suits the area. Of course, many people disagree on the issue and essentially the debate has two extremes. The first position centers on preservation of the entire area, including the Wonderland Hotel and all buildings (see Figure 24). In the opposing position, conservationists are fighting to remove every building, so the area will be able to return to its original natural setting, even going so far as to remove all nonnative species of plants. The NPS is caught in the middle and must conduct the investigative process in a professional and thorough fashion to ensure a well informed decision that will avoid more controversy over Elkmont.



Figure 24 Rear View of Wonderland Hotel in Fall 2004.

Photograph taken by author.

The NPS plans to have a final decision concerning the future of Elkmont in mid summer of 2005. As part of its deliberations, the NPS has divided the project into three phases, each with a time frame and progress report. The first phase will end in December 2004 and constitutes the research portion of the process. Phase two will stretch from December 2004 until April 2005 and will be a review and editing of the research. Finally, phase three will be the "record of decision", which will take place between April and July 2005.86 Throughout these phases, the NPS

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⁸⁶ National Park Service

will keep the public abreast of progress via a dedicated website, which is an objective source of Elkmont information and includes specific details concerning frequently asked questions, the Wonderland Hotel building assessment, and other helpful information.

Phase one includes "all investigations, coordination, and documentation required to create the Draft Environmental Impact Study (EIS) document."87 The EIS is a more in-depth Environmental Assesment (EA) that began in 2001 and was a result of new information that was not available at the time of the original 1982 GMP. Furthermore, the EIS will cover all aspects of the area, including, but not limited to, the cultural and natural resources, potential impacts to the air, noise levels, vistor use and experience, economics, and transportation.88 An environmental enginnering firm, TN and Associates, was contracted to conduct the survey, which is an exhaustive account of all structures in the area, but also a recreational use report, and a natural resources baseline report. Another important feature of the reports is the attention to economics. For instance, each alternative produced includes a cost estimate and breakdown.

http://www.elkmont-gmpa-ea.com/purposeandneed.html

⁸⁷ Ibid

⁸⁸ Ibid

The list of seven alternatives includes a detailed breakdown of every building and these alternatives span the spectrum between extremes.

- 1. No Action Alternative-Implementation of the GMP
- 2. Alternative A-Natural Resource Restoration
- 3. Alternative B-Partial Daisy Town Restored
- 4. Alternative C-Restore Daisy Town and Chapman Cabin
- 5. Alternative D-Restore Daisy Town, One Cabin on Society Hill, One Cabin on Millionaire's Row, Six Cabins at Wonderland and the Wonderland Hotel and Annex
- 6. Alternative E-Restore Daisy Town, One Cabin on Society Hill, Millionaire's Row, and Wonderland Hotel Area
- 7. Alternative F-Maximum Reuse⁸⁹

Furthermore, the firm presented their findings and list of alternatives to the general public in two meetings in March 2004. The first meeting was held in Gatlinburg, TN and had approximately seventy-five people in attendance. The following evening, 9 March, the firm presented the same report to 100 people in Knoxville, TN. Both meetings encouraged feedback from the audience, in the form of a written survey, rather than a forum setting. However, in Gatlinburg, audience participants tried to voice their opinions, but were not recognized. Furthermore, people wore buttons and tee-shirts proclaiming their stance on the issue. Public comments were accepted until 7 April 2004

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⁸⁹ National Park Service
http://www.elkmont-gmpa-ea.com/draftalt.html

and were recevied at the meetings, via mail and electronicmail.90

The NPS received 250 "individual" comments and did not include 1,101 identical form letters they received because the letters expressed the same opinion, which is not disclosed. Also, they tried to categorize some of the most prevelant concerns. For instance, many people were worried about the funding for Elkmont projects. People expressed their interest in using funds for Cades Cove, rather than Elkmont. 91 Of course, National Parks are always struggling with funding issues, and distribution of the meager monies they get from the U.S. government.

Another popular concern was the potential for loss of cultural resources, which would take place under the No Action Alternative and Alternative A. Also, if lodging was granted in the area, some feared the increased traffic would damage archeological resources and buildings would not be available to the general public, but only for renters of the Elkmont facilities. Natural resources were also a main concern since Elkmont is the sacred habitat for the synchronous fireflies and the montane alluevial forest. In June 1994, the Associated Press reported that a Georgia

⁹⁰ National Park Service

http://www.elkmont-gmpa-ea.com/March04PubMeet.pdf

⁹¹ Thid

State Ethnologist confirmed the unusual prescence of a Photius carolinus firefly specie. Historically, Asia was the only place where people could view fireflies blink in unison. ⁹² Ironically, the fireflies preferred habitat is open fields, which would not be maintained under the extreme conservation alternatives (see Figure 25).



Figure 25 "Faust Field" where the fireflies have proven to be the most active. Photograph taken by author.

Also, since the Little River bisects the Elkmont community and campground, people are concerned about the quality of the water if the number of visitors is increased. In addition, the debate over the use of the buildings was a common concern. People felt that specific uses described as housing, visiting scientists, curatorial purposes, and storage, and limited access to the buildings, were not "for all the public to use." Examinination of the

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⁹² Don Hendershot. "Flashes in the Night," The Chattooga Quarterly. Summer 1998.

tabulation report reveals the split opinion over use of the area. Forty-one respondents are in favor of the No Action Alternative, while forty-seven people voted for Alternative F, which is the maximum reuse. 93

During the investigative process, the NPS has set up a website dedicated to the Elkmont issue and maintains the site as a way to keep the public informed. Since public input is an important key for a successful outcome, the website provides an accessible source for history, progress, and calendar of decisons for Elkmont. One of the best features of the site is the Frequently Asked Questions page, which covers twenty-one of the most poignant issues for Elkmont. The questions range from basic preservation questions, like the difference between "contributing and noncontributing" to sensitive issues like the lifetime leases granted to Elkmont residents. 94 Overall, the answers are objective and do not make any assumptions of the outcome (see Appendix A).

One of the more interesting questions asks "why are the Wonderland Hotel and Elkmont cabins of archtectural significance?". 95 For many people, architectural

95 Ibid

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⁹³ Ibid

⁹⁴ National Park Service http://www.elkmont-gmpa-ea.com/faq.pdf

significance is usually reserved for high style architecture and Elkmont hardly represents high style. fact, it has been referred to as a ghetto since most of the buildings have been haphazardly repaired and not maintained. The website answers the question by referring to the National Register Form, which explains the buildings "typify rural building traditions in the Tennessee Mountains" and as a collection of buildings represents a unique district. 96 Unfortunately for the buildings in the district, they have not been maintained by the NPS since the leases expired (see Figure 26). In fact, the buildings have essentially become victims of demolition by neglect, which simply means some of the buildings have been exposed to the elements so long without general maintenance they are dilapidated and cannot be repaired without a major expense. The most glaring example is the Wonderland Hotel building, which is the anchor for the Elkmont community.

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⁹⁶ Ibid



Figure 26 Deteriorated cabin in Appalachian Club area. Photograph taken by author.

The Wonderland Hotel

Until 1993, the Wonderland Hotel still operated as it had for almost a century, as a hotel and restaurant for guests to the GSMNP. Unfortunately, in 1993 when the NPS took over the Hotel, the doors were closed and no maintenance was performed for many years (see Figure 27). In addition, vandalism and exposure to the natural elements expedited the deterioration of the building. Finally, in May 2001, Tom McGrath of the Historic Preservation Training Center, conducted an "exterior existing condition assesment." 97 At the same time, he put together a stabilization plan for the structure, since the building

⁹⁷ National Park Service http://www.elkmont-gmpaea.com/Wonder.html

was in a serious state of disrepair. According to his report, "though the visible damage to the Wonderland Hotel is unsettling, there is enough sound material throughout the structure to make preservation a viable option."98 He was unable to observe the interior since carpeting and drywall still covered the floors and walls. Some of his stabilization plan recommendations were implemented in an effort to slow the degradation process. Signs were put up around the fenced perimeter warning of no trespassing and declaring the hotel as property of the U.S. Government (see Figure 28). More importantly, an architectural firm was hired to design a roof tarp to help seal the failing roof. Also, the hotel underwent a major vegetation management overhaul to clear plants both inside and out. Furthermore, the interior of the structure was cleared of its carpeting, dropped ceilings, and general debris that had accumulated over the years. 99

⁹⁸ Thid

⁹⁹ Ibid



Figure 27 Porch on Wonderland hotel, now almost completely gone. Photograph taken by author in Fall 2004.



Figure 28 "No Trespassing" sign on Wonderland Hotel outbuilding. Photo taken by author.

Then, in April 2002, Steve Gaddis performed another condition assesement with the TN&A/TRC because of the EHD survey that was taking place for all buildings in Elkmont. After their visit, they "determined the hotel could be restored, albeit at a high cost." 100 He judged the building to be in "fair" condition. McGrath had ruled the exterior to be "good to failing" in 2001. 101

So, in the Spring of 2002, the Wonderland Hotel was still a candidate for preservation, but in 2003 McGrath made a second visit and reached a different conclusion. March 2003, Park Staff toured the Hotel to observe roof work and to plan more stabilization efforts. On this visit, they uncovered more problems, that had not been noticed on the two previous assessments. As a result, McGrath was hired to perform a second assesment. Now that the interior was visible, McGrath made a thorough survey of the building and, this time, ruled that "the overall condition of the structure has failed." Furthermore, he stated that "approximately five percent of the exisitng fabric was salvageable for reuse (see Figure 29)."103

 $^{^{100}\,\}mathrm{Ibid}$

 $^{^{101}}$ Ibid

 $^{^{102}}$ Ibid

 $^{^{103}}$ Ibid



Figure 29 The Wonderland hotel front porch roof and some evidence of the protective tarp. Photograph taken by author.

Preservation Efforts

One of the sorest points for preservationists in

Elkmont is the NPS handling of the Wonderland Hotel. One
of the most important advocates for the preservation of

Elkmont is Lynn Frierson Faust. In a brief written by

Faust concerning the hotel assessment, she states, "if the

Wonderland goes, then most likely everything goes (see

Appendix B)." She also describes the predicament for

preservationists in regard to the hotel's future. If she

surrenders and agrees that the hotel is not a candidate for

preservation, then the only alternative is reconstruction.

Of course, reconstruction is hardly a realistic

alternative, since the NPS is quite stringent on

reconstruction projects, not to mention the elimination of

tax credit possibilites. Faust goes on to say that the

hotel is the keystone for Elkmont and without its presence,

a "central gathering place" would be lost. 104

As a member of the Elkmont Preservation Committee (EPC), Faust has a lifetime perspective of the Elkmont debate. As a child, she and her family would spend weekends and summer weeks in their Elkmont cabin (see Figure 30).

The Mission of the Elkmont Preservation Committee is:

- To preserve the history, structures, and cultural story of the Great Smoky Mountains' community of Elkmont.
- 2. To educate and encourage the public to experience the Elkmont Historic District by utilizing this community in its original historical context: as a place of fellowship, retreat, renewal, and recreation.
- To further the understanding of the public's role of our most precious public inheritanceour National Parks.¹⁰⁵

The EPC has played an important role in the Elkmont process and has worked with the NPS during the recent planning phases. Also, the EPC has worked to have Elkmont listed on

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 $^{^{104}}$ Ibid

¹⁰⁵ Thid

the National Trust for Historic Preservation's list of ten most endangered historic properties in the U.S. In 1999, the EHD was also declared an offical project of "Save America's Treasures." In addition countless letters have been written to politicians and publications.



Figure 30 Faust Cabin located in Appalachian Club Town.

Photograph taken by author.

Conservation Efforts

On the other hand, several organizations have been working hard to limit the preservation efforts and push for the No Action alternative. Generally these parties are motivated only by the conservation aspects of Elkmont. However, some groups have made the fight for conservation a fight against the preservation efforts simply because they do not agree with the preservation of Elkmont. More

 $^{^{106}}$ Tbid

specifically, the Smoky Mountains Hiking Club issued a letter from Ray Payne, their Conservation Committee Chairman, detailing the Elkmont history in terms of the EPC reneging on their agreements with the NPS. He even goes so far as to accuse the EPC of offering the NPS a monetary bribe. Also he claims the EPC has used political connections to "make a historical district out of an area that is clearly not of any national significance (see Appendix C)." He also questions why funds are not allocated for buildings in the Cades Cove area, which are "truly historic." For many people, Elkmont is not obviously historic, but technically speaking the area clearly meets the guidelines of nationally recognized historic properties. After all, it is listed on the National Register and, therefore, it meets the criteria established for determining historic significance.

In addition, the Tennessee Chapter of the Sierra Club issued an urgent letter stressing the environmental protection of Elkmont. The letter cites the preservation movement as "well organized" and mentions a public meeting where fifty of fifty-three of the audience, were in favor of preservation and urges members to be present at future

 $^{^{107}\,\}mathrm{Ibid}$

meetings. 108 Ironically, the publication suggests the protection of one to four structures for the interpretation of the logging history, because,

"interpretation of the logging industry lifestyle in the GSMNP is important." 109

¹⁰⁸ Sierra Club

http://tennessee.sierraclub.org/broome/sos/elkmont alert.ht

109 Ibid

CHAPTER VI

WHAT LIES AHEAD FOR ELKMONT

NPS Decision

Sometime between April and June 2005, the NPS will make a final decision concerning the future of Elkmont. The decision will become an amendment to the 1982 GMP and will take effect immediately. Apparently that alternative will come from the list of seven that were submitted by the NPS in early 2004. Although the options list is a thorough account of the buildings and the impact of certain decisions, the final alternative should not be limited to these seven choices. On the contrary, a unique alternative should be created to meet the many needs of Elkmont. the opinion of the author that the future of Elkmont has become an argument waged in the media and in many ways the true preservation and conservation considerations have been neglected. The hope is that the following reccommendations will provide a fresh perspective on a highly publicized, often personal, complex debate.

Recommendations

(see Figure 31)

1. Wonderland Hotel- take no action

The Wonderland Hotel should remain as it does today. The area should continue to be fenced off from visitors and should exist as a unique exhibt. Unlike any other NPS resource, the hotel demonstrates the definition of demolition by neglect as a consequence of the NPS indecison and the dramatic effect of nature on buildings. Over time the building will decay and evolve as a changing exhibit that will document natural damage in the absence of building maintenance. Of course, interpretive signs should be put in place to explain the site and the history of the hotel and Elkmont.

2. Partial Restoration of Elkmont— restore certain cabins
Most of the cabins in Elkmont should not be restored.

However, the cabins that have maintained their integrity
and could serve a modern function for the GSMNP should be
restored per Secretary of the Interior's Standards. For
those cabins that are not restored, the bulk of the
structure should be removed, but the foundations should
remain to represent the development that contributed to the
National Register Nomination and listing.

3. Partial Conservation- take note of species

The natural habitat of Elkmont should be restored in terms of the elimination of nonnative plant species and the reintroduction of native plant species. Also, the mowed field should contine to be cleared to promote the synchronouse fireflies. Furthermore, the Little River, an Outstanding Natural Resource Water in Tennessee, should be guarded from negative impact by keeping all new infrastructure additions out of the streams. From an environmental perspective, the "Elkmont cabins create no adverse environmental impact." 110

4. <u>Use-</u> interpretive tour, overnight accomodations, internal park use

The cabins and Appalachian Clubhouse should be used for public use and for GSMNP staff. The accommodations would be managed as low-impact services, which means there would be little or no amenities such as electricity and plumbing in every building. In addition, a thorough interpretive program would be established for visitors that would include a history of the Native American community; logging

National Register Nomination Form, 1994. On file at TN SHPO/Tennessee Historical Commission, Department of Natural Resources, Nashville, TN. Appendix, P. 48

community; resort community; the GSMNP; and the complex debate over the area. Some buildings would remain open with exhibits, like buildings in Cades Cove and other parks in the NPS system.

1. <u>Wonderland Hotel</u>	Take no action
2. <u>Partial Restoration of</u>	Restore certain cabins
<u>Elkmont</u>	
3. <u>Partial Conservation</u>	Take note of species
4. <u>Use</u>	Interpretive tour, overnight
	accomodations, internal park
	use

Figure 31 Table of Recommendations

Discussions of Recommendations and Related Issues

1. Wonderland Hotel- take no action

Unfortunately, the Hotel has been deemed unrestorable by several sources, including the author, and the only option is reconstruction. For several reasons reconstruction is not a realistic option considering the expense and the historic integrity. Rather than rebuilding the Hotel, the structure should be left as is with the chain link, barbed wire fence. As a result, the GSMNP would make a bold

statement of preservation and conservation in a simple, inexpensive exhibit. Furthermore, the Hotel can be the beginning point of the Elkmont Interpretive area, since it sits at the entrance to the campground and area, where visitors can read about the history of Elkmont as a thriving logging community; as a thriving resort community; as part of the GSMNP; and the complex debate that has ensued. Of course, neither preservationsists or conservationists may be content with the scenario. However, as a compromise, the no action will be a concession from the preservationists, but will still represent a key feature of preservation in Elkmont. On the other hand, the conservationists will be compromising on the complete removal of the structure.

2. Partial Restoration of Elkmont— restore certain cabins
Many of the cabins are in similar dismal condition as
that of the Wonderland. Also, twenty—three of the seventy—
four buildings are noncontributing. If the restoration of
certain key buildings is undertaken the area will maintain
the resources necessary to interpret the importance of
early resort development. For those buildings not fit for
restoration for reasons due to integrity, condition, or
lack of significance they should not be totally removed.

However, the foundation or some evidence should remain to give the sense of a built community that makes Elkmont so important. That said, the early twentieth century Elkmont story should be interpreted for visitors, much like the time-specific Cades Cove interpretation. Elkmont can represent a different time period for Park interpretation and be maintained as such. The financial burden of restoration is hard to impose on the GSMNP since they are "facing an annual budget shortfall of at least \$11.5 million." However, if private funds are used to make the improvements, the NPS would benfit from the incomeproducing cabins. In fact, the Izaak Walton League, an environmental group who has studied Elkmont, encourages the use of private funds to maintain Elkmont to serve the general public. 112

3. Partial Conservation- take note of species

From an ecological perspective, humans have been in the Elkmont area for centuries and in some ways the natural environment has benefited from human presence. For instance, the synchronous lightning bugs thrive on the

¹¹¹ Gregg Kidd. "Bottom line: Site Cannot be Commercialized," March 28, 2004

¹¹² John Stiles. "Wonderland Should pay own way or go awaystudy," The Knoxville (TN) News-Sentinel, November 3, 1991. P. B3

field that has been cleared by Elkmont residents. Scientists have suggested that without the field, the insects may not be inclined to perform their unique show. Also, since the GSMNP is the most visited National park in the country, human impact is already a Park concern. specifically, in the Elkmont campground, which sits in the original logging town, 48,681 people visited. During 2000 and 2001, when these numbers were collected, the Elkmont visitors were about forty percent of the total campers in the GSMNP. 113 From a planning perspective, the cabin community is well designed for environmental considerations. For example, the buildings sit on two of the eighty acres that constitute the Elkmont area. Since the buildings already exist, there would be no new development or needs that the Park will eventually need to address. Surely, restoration of Elkmont structures is more favorable than errecting new buildings in other areas of the park.

4. <u>Use-</u> interpretive tour, overnight accomodations, internal park use

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National Park Service website-Recreational Use Report http://www.elkmont-gmpa-ea.com/BaselineSum.html

The financial burden of Elkmont is a key concern for all parties invloved. Ironically, most of the antipreservationists seem to think that any plans for restoration would be too costly. However, through the national governemnt several programs have been created to alleviate costs of restoration. In fact, if the units are leased to private entrepeneurs, certain arrangements could be made for free rent in exchange for restoration funding. In some parks, the NPS has issued a unique lease option for businesses, in exchange for maintenance work. Also, if units are income-producing, they could be elgible for tax credit incentives that could either be used or sold to another party, not to mention numerous grant programs.

Conclusions

Finally, the ultimate solution will come from a compromise on both sides. Neither conservation or preservation can be the sole victor in Elkmont. The natural environment can exist in harmony with the built environment and as a result, both natural and cultural heritage can be interpreted for future visitors. The key to success is an amendment to the 1982 GMP that includes considerations for the environment and the historical significance. Keeping that in mind, the NPS should look to

the future and attempt to avoid another situation like Elkmont. Otherwise, resources, both natural and cultural, are endanger of being lost because of the conflict of philosophies and a slow moving bureaucracy.

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APPENDIX A

NPS-ELKMONT FREQUENTLY ASKED QUESTIONS

Elkmont Historic District Frequently Asked Questions

Great Smoky Mountains National Park National Park Service U.S. Department of the Interior



Frequently Asked Questions Regarding the Elkmont Historic District Planning Process

What is the role of public opinion in the decision making process for the Elkmont Historic District (EHD)?

The role of public involvement in this planning process is to review the planning process and comment during periodic comment periods or anytime throughout the process when beneficial input is helpful.

The role of individual citizens and interest groups is to actively participate in the planning process by informing the Park about issues, concerns and opportunities regarding the future management of Elkmont Historic District. Through integration of the Section 106 [National Historic Preservation Act (NHPA) of 1966, as amended)] consultation process with the National Environmental Policy Act (NEPA) planning process, members of the public have had opportunities throughout the entire planning process to express their viewpoints. To date, these opportunities to comment include surveys, meetings in May and August 2002, February 2003, March 2004, and workshops, as well as via e-mail and written correspondence during 30-day comment periods and throughout the entire planning process. The Elkmont website was developed to update the interested public on project progress and activities, as well as to provide information from the baseline studies. Comments from the public have been taken into account in the development of the goals and objectives of the project, lists of potential uses for Elkmont, and the alternatives development process. The public will also be able to comment on the NEPA document (i.e, Environmental Assessment (EA) or Environmental Impact Statement (EIS)/General Management Plan Amendment (GMPA) when it is released in coming months. The Park will carefully review all alternatives before selecting an alternative for implementation.

2. When is the next time that the public will have an opportunity to comment?

The comments made by the public at all public meetings and workshops, were considered in developing alternatives for the Elkmont Historic District. The alternatives are being carried through the process of impact analysis; once impact analysis is completed, the Park will select an environmentally preferred alternative. The analysis of the Park's environmentally preferred alternative, along with all of the other alternatives studied for impact analysis, will be presented for public review in the Draft Environmental Impact Statement (DEIS). This DEIS will be available to all interested persons for a 30-day review and comment period.

3. How will the final decision be made?

After reviewing the public's comments and those of the Consulting Parties, the Park will evaluate the results of the impact analysis and select the alternative that best meets management objectives for the Park and Goals and Objectives of this project specifically.

4. How will my "vote" count?

The NEPA and NHPA processes are not "voting" contests. The planning team has identified public sentiment from the initial public scoping phase of this process, purely for information purposes only. The end decision will be made, including public comment, based on management objectives, how plans best fit project goals and objectives, and after a full scientific and economic analysis has been conducted as part of the Impact Analysis phase of this project which will identify the environmentally preferred alternative. The National Park Service will then make an Agency preferred alternative based on all the above information that will then guide future management of the district.

What do "contributing" and "noncontributing" mean, in terms of structures at EHD?

"Contributing" structures are those buildings and other structures that are thought to
"contribute," or add, to the significance of EHD; while those considered "noncontributing"
are the ones that are still historic but either architecturally, or for some other reason, do not
"contribute" to the significant characteristics of EHD. At Elkmont, structures that have
been modified such that their architectural character does not authentically represent the
period of EHD's historic significance (1908-1940) are considered "noncontributing."

General criteria for evaluating significance, taken from the Tennessee Historical Commission's National Register of Historic Places Information Packet (November 3, 1989), are:

Buildings and man made site features over 50 years of age, and

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction; or that represent the work of a master; or that possess high artistic values; or that represent a significant and distinguishable entity whose components may lack individual distinction (like a district); or
- That have yielded, or may be likely to yield, information important in history or prehistory.

Additionally, the National Register Bulletin 16, (November 30, 1986) page 42, states

"A contributing building, site, structure, or object adds to the historic architectural qualities, historic associations, or archeological values for which a property is significant because: a) it was present during the period of significance, and possesses historic integrity reflecting its character at that time or is capable of yielding important information about the period; or b) it independently meets the National Register criteria."

"A noncontributing building, site, structure, or object does not add to the historic architectural qualities, historic associations, or archeological values for which a property is significant because: a) it was not present during the period of significance; b) due to alterations, disturbances, additions, or other changes it no longer possesses historic integrity reflecting its character at that time or is incapable or yielding important information about the period; or c) it does not independently meet the National Register criteria."

How can I get more information about the National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA)?

In addition to general guidelines laid out in NEPA and NHPA legislation, the National Park Service (NPS) has prepared detailed written guidance on implementation of NEPA and NHPA. The primary source of guidance is the 2001 edition of Management Policies, supplemented by Director's Orders, Handbooks, and Reference Manuals. Director's Orders 12 and 28 provide guidelines for NEPA and NHPA implementation. The Director's Orders can be found at the following Internet site:

http://data2.itc.nps.gov/npspolicy/DOrders.cfm

7. How did Elkmont get listed on the National Register of Historic Places?

The National Park Service (NPS) nominated the Elkmont area in late 1993 and the district was listed on the National Register of Historic Places in 1994. Sections 106 and 110 of NHPA require that all federal agencies consult with State Historic Preservation Offices (SHPO) and Tribal Historic Preservation Offices (THPO), and in certain cases with the National Advisory Council on Historic Preservation (ACHP), to identify potentially eligible historic properties, especially those that may be affected by any federal undertaking. In this case, NHPA required NPS to initiate the consultation process before implementing the 1982 General Management Plan that calls for removing the Elkmont buildings. This consultation resulted in the identification of the historic District for listing on the National Register.

8. How were the EHD boundaries determined?

The EHD boundaries were determined as part of the process of listing the district on the National Register of Historic Places. As noted in Section 10 of the nomination, the boundary "includes all existing properties [i.e., buildings, structures, and features] associated with the Elkmont Historic District." Section 10 also states that the boundary encompasses the Wonderland Club and Appalachian Club complexes, and "the environment or setting in which the resources are located." The boundary also includes the location of the former town of Elkmont (now the campground), and the road network linking all of the areas. The boundary extends in most places to the 2,400-foot contour line

(the 2200-foot contour line is utilized along a portion of the district's west side) and follows streams, roads, and trails in other locations. As mentioned above, this was done in order to include within the district the natural environment or setting in which the manmade buildings, structures, and features are located now and were located historically.

9. What is the historic significance of Elkmont, the Wonderland Hotel, and the cabins?

The historical significance of Elkmont, the Wonderland Hotel, and the cabins is discussed in the National Register nomination prepared for the EHD. Section 8 of the nomination states:

"The district is significant under Criterion A [historical events] as the only remaining collection of early 20th century resort cabins retaining integrity in the Appalachian Mountains of Tennessee...Elkmont is significant under Criterion A in the area of entertainment/recreation. Elkmont was formed during the outdoor recreation movement of the early 20th century. This movement stressed a return to nature and resulted in the construction of hotels and mountain camps throughout America. The universal enthusiasm of Americans for the "back to nature movement" could be seen in the vast expansion of the national park and forest system under presidents Theodore Roosevelt and William Howard Taft, the popularity of outdoor adventure stories, creation of the Boy Scouts in 1910 and the Campfire Girls in 1912, and the vogue of bird watching and sportsman's clubs. In the Southern Appalachians, this renewed interest in outdoor life led to the construction of numerous hotels and mountain cottages."

"...earlier resorts in Sevier County such as Glen Alpine and Henderson Springs attracted prominent Knoxville families, Elkmont is probably unique in its permanent long-time association with individuals prominent in the business, professional, social, and civic life of East Tennessee."

"Elkmont has both local and state significance. Not only is this resource unique in Sevier County, but no similar collection of early 20th century cabins and mountain hotels is known to exist in the Appalachian Mountains of East Tennessee. Other summer resort complexes in the vicinity such as Line Springs and Dupont Springs have been razed, while the resort cabins at Kinzel Springs in Blount County have been modified and no longer retain integrity. The creation of the Great Smoky Mountains National Park in the 1930s largely halted construction at Elkmont resulting in few changes to its pre-1940 appearance."

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The Wonderland Hotel was unique. Unlike other resort hotels on commercial rail lines or roads, it was located deep within the mountains in an area accessible only by a logging train that was also used as an excursion train for tourists. As a result, it became a popular tourist destination. No similar hotel was located within the boundaries of Great Smoky Mountains National Park."

10. Why are the Wonderland Hotel and Elkmont cabins of architectural significance?

The Wonderland Hotel and the Elkmont cabins are of architectural significance because their forms and plans typify "rural building traditions in the Tennessee Mountains" (see Section 8 of the EHD National Register nomination). The buildings illustrate both local craftsmanship and the use of locally available materials (i.e., river rock and locally milled lumber), as well as stock materials brought in from outside the area (such as windows, doors, and hardware). The buildings also "reflect a simplicity of form and function" (see Section 8 of the EHD National Register nomination). Porches tie the buildings directly to the surrounding natural landscape, as do the wood and stone building materials. River rock also is used as a landscape feature in retaining walls, property boundary walls, walkways, and planters.

Another important factor is that the collection of buildings and features at Elkmont is greater than any one building. As National Register Bulletin 15, "How to Apply the National Register Criteria for Evaluation," points out, a district can be eligible under Criterion C (design/construction) even if its "components may lack individual distinction" (page 17). Thus, while on a case-by-case basis, the buildings may not appear architecturally significant, the group as a whole does retain its architectural significance.

11. Why are these vacation homes being preserved when the homes of other former residents were removed?

The Elkmont area was placed on the National Register of Historic Places in 1994 because the National Park Service determined that it had both historic and architecturally historic significance. This decision was made 12 years after the development of the current Park management plan, which calls for the removal of the buildings. Unlike most other cases throughout the Park, where property owners were paid on a fee simple basis for their property and were then removed upon transfer of property rights, Elkmont summer residents were able to negotiate a special agreement with the National Park Service. Property owners at Elkmont settled for a one-half payment of property value in exchange for the privilege of a lifetime lease on this property. Many prominent East Tennesseans were members of these two clubs. The governor, a state senator, and attorneys and judges who were trying and hearing the condemnation cases on the removal of families from lands to be incorporated into the Park also held property here. In addition to the special half payment agreement negotiated by Elkmont residents, lifetime leases were extended and, in some cases, transferred to younger family members or friends at least two times. This meant that leases originally established in 1934, did not expire until 1992, for the majority, and until 2001, for the last four.

Given that Elkmont is on the National Register of Historic Places, the buildings have not been torn down and cannot be altered or removed until the current Elkmont planning process is completed. The result of this planning process will determine if and how any of these buildings will be reused or removed.

12. Will Native American artifacts be protected?

Yes. Native American and other archaeological sites and artifacts will be managed in compliance with the National Historic Preservation Act (NHPA), National Environmental Policy Act (NEPA) and all other federal regulations and guidelines. A preliminary archaeological reconnaissance of EHD and an intensive archaeological survey within the District has been completed. Any unavoidable impacts to significant archaeological sites will be mitigated in accordance with NHPA. Any recovered artifacts will remain the property of the National Park Service, and will be curated in accordance with federal regulations.

13. If the Wonderland and the cabins are renovated for rental, will they be available to the general public?

Yes. Any structures that may be renovated for overnight rental would be available to the general public. Exclusive leases by individuals, clubs, or special interest groups will not be allowed. An equitable means of reserving units would be developed such as first-come-first-served basis, lottery, or other method that would assure an equal opportunity for all who wish to stay in the hotel or cabins.

14. Will anyone be able to lease a cabin in EHD?

Overnight rental use by the general public would most likely be concessionaire-operated with the public obtaining rooms or cabins on a nightly or weekly basis. No long-term leases of cabins to private individuals would be allowed.

15. The overwhelming public opinion at the September 2002 public workshop at Pellissippi State and previous public meetings was that the Wonderland Hotel and all the cabins should be renovated for overnight rental. Why was overnight rental not a component of more of the revised alternatives presented at the February 1, 2003, public workshop?

One goal of the alternative development process is to produce a broad range of possibilities using input from many constituents. Overnight rental was in fact considered and alternatives were adjusted drastically following the September public workshop to accommodate a maximum as "total rental" scenario as possible. Two of the five proposed action alternatives presented on February 1, 2003, or 40 percent, contained an overnight rental component available to the general public. Members of the public who participate at public meetings are only some of the many interested parties consulted in the alternatives development process for this National Park. Project goals, Park needs, operational

considerations, staffing, and all applicable policies and regulations are also being considered in developing the full range of alternatives.

16. Will the history of the railroads and logging be included in the interpretive displays at Elkmont?

In all EHD alternatives, interpretive displays are recommended to tell the complete story of the human continuum in the Elkmont Historic District. Human occupation at Elkmont includes prehistoric as well as historic pioneer settlement, logging, railroads, resort development, and Park formation periods. All of these historic aspects of life at EHD will be depicted, and the impact of the railroad and logging activity will also be significant parts of the interpretive displays.

17. How will the restoration of structures in the EHD be funded?

Funding for whatever actions are selected for Elkmont can come from a variety of sources including federal appropriations, private donations, and revenue- generating uses, or some combination thereof. The source of funding will most likely vary depending on which alternative is selected for implementation.

18. How were the names that refer to different areas within EHD selected?

The names were selected from maps, historic documents and references, and oral traditions obtained from interviews with former residents and participants at the public meetings. The two social clubs, the Wonderland Club and Appalachian Club, also provided names for general areas, but separate designations were needed to distinguish the three well-defined sub-areas of the Appalachian Club. The names "Millionaires' Row," for the large houses along the little river; "Daisy Town," for the dense cluster of cabins near the Appalachian Clubhouse; and "Society Hill" (earlier referred to as Jake's Creek), for the string of cabins going up the hill along Jake's Creek, were all provided by former EHD residents and researchers.

19. In light of the fact that Western National Parks preserve and operate Historic Hotels and Lodges, why can Great Smoky Mountains National Park not do the same?

One important distinction between Western Park hotels and lodges and Great Smoky Mountains National park is that in many cases services are not conveniently located or exist outside Western Park boundaries as they exist with this Eastern Park. The Wonderland Hotel, constructed in a simple fashion, was a private hotel long before the Park was created. The National Park Service would not have built it in the same manner.

If it is determined to be appropriate and necessary per National Park Service and Park specific guidelines, regulations and policy, then the Wonderland Hotel may be reconstructed and operated as a concession for overnight stays. Any impacts associated with this potential reuse, including cumulative impacts, that will have adverse effects on the District and its other significant resources, both cultural and natural, will be considered and evaluated prior to selecting a preferred alternative.

How were alternatives A, B, C, D, and E presented at the February 1, 2003, Public Workshop developed?

To satisfy mandated planning requirements for the Park, it is necessary to develop a full range of alternatives. At Elkmont, this range of uses runs from removing all structures and having no overnight use to saving most structures with the maximum overnight use within the carrying capacity of the site. The planning team of Park staff and consultants met many times to revise alternatives based on project goals and objectives, use and screening questions presented at the August public meetings, alternatives presented at the September public workshop, and the discussion during the Consulting Parties meetings.

Through intensive internal scoping efforts, public meetings and workshops, a list of possible uses and reuses was generated. Potential uses were screened through a matrix, based on National Park Service policy and management guidelines that resulted in a list of uses that met project objectives. These uses were then incorporated into the first draft of conceptual alternatives. The draft conceptual alternatives were presented both at a public workshop and then again to the Consulting Parties forum in September and October 2002, for review and comment. Based on comments and continued project work, alternatives were further refined and a second draft of conceptual alternatives were presented to the Consulting Parties and public in January and February 2003 for review and comment. Over 200 interested citizens who contributed comments as part of the designed forum at this meeting attended the February workshop. In addition to comments received at the workshop, nearly 200 individual comments were received through mail and e-mail as part of this latest public involvement. Alternatives are currently being adjusted to better reflect Agency objectives and to address substantive public comments before the Impact Analysis phase of the project.

21. Were other potential EHD uses considered in developing the alternatives?

Yes, initially over 20 potential uses were identified by NPS and the public. Uses that did not meet Park management objectives, regulations, or project goals and objectives were dismissed, and the resulting list of potential uses was made available at the public meeting in September 2002. This list is available on the Elkmont website (listed in Question 1 above under Public Meeting #2 August 2002/Possible Uses for Elkmont District).

APPENDIX B

WONDERLAND HOTEL ASSESMENT

Wonderland Hotel Assessment

"Demolition by neglect" means neglect in maintaining, repairing, or securing an historic landmark or a building or structure in an historic district that results in deterioration of an exterior feature of the building or structure or the loss of the structural integrity of the building or structure."

http://www.dcwatch.com/archives/council12/12-754.htm Prevention of the Demolition of Historic Buildings by Neglect Emergency Amendment Act of 1998.". Bill 12-754 "(c-l)

- In 1992, my family, like so many others from around our country and the world, enjoyed the hearty country meals, world class rocking on the porch and stepping back into a simpler time as guests of the Wonderland Hotel.
- In 1993, the NPS took over stewardship of and closed to the public this almost century old Wonderland and the cabins of the now Elkmont Historic District.
- In 1993, this same hotel was nominated and listed on the National Register of Historic Places as part of the Elkmont Historic District.
- In 1999, the Wonderland and EHD were selected as an "Official Project" of the Save America's Treasures Program. Nominated by then GRSM Superintendent Karen Wade and Park Historian David Chapman for the National Trust/White House/NPS partnership of the "Save America's Treasures" program, this program seeks out and honors the most endangered national treasures in the USA. SAT designation is one of the finest possible credentials denoting historic significance in the country today. This program is now linked with the White House's "Preserve America Initiative". Millions in funds are available for nominees.
- In 2001 Mr. Thomas McGrath of the HPTC submitted a Condition Assessment and Stabilization Plan for this 90 year old Wonderland Hotel which had now gone nine years with no maintenance and much vandalism. He states, "...there is enough sound material throughout the structure to make preservation a viable alternative. However, it cannot be stressed enough that time is limited for the structure".
- By June of 2002, in his Draft report, Mr. McGrath reports, "the deterioration in the last 13 months has made the Wonderland Hotel's future much less promising"
- By April of 2003, Mr. McGrath states, "The overall condition of the structure (Wonderland) has failed". Please, reread the definition of Demolition by Neglect.

Terminology Concerns

The Secretary of the Interior Standards listed on the errata sheet, the Training Center ratings and terminology, combined with the governmental and economic consequences of labeling the Wonderland either Good, Fair or Poor, a reconstruction, restoration or rehabilitation creates a Catch 22 situation:

If we agree with the "failed" status of the Wonderland, then "reconstruction" is the only option. But in practical terms, "reconstruction" status, though economically and practically the best option, is the same as a death sentence for the future of the Wonderland.

Reconstruction is a "last resort measure....only upon specific written approval of the director after policy review in the Washington office" Just who is the director of what office and MOST important WHEN- at what point in this process- would this determination be made?

If we could go to the next consulting parties meeting with the written assurance of reconstruction of the Wonderland (if that alternative was chosen) from the director, then our reservations of accepting the "failure status" of the Wonderland might be lessened.

Any structure can be restored. If just a few boards remain, "there is no magic number or percent ratio to distinguish a restoration from a reconstruction." (Close out answers #1) It appears to boil down to the ultimate desire of the decision makers.

Mr. McGrath is correct in that the vast majority of the materials in the Wonderland will have to be replaced, but it is doable. All structural components such as floor joists, beams, foundation, windows, floorboards, etc. can be repaired/replaced. Mold and spores can be dealt with. Experts are available in all areas of the country. The Park just has to decide it is important enough to allow it to be done.

If the Wonderland is classified as a "Resconstruction", then the Park has:

- 1. Eliminated two of the strongest proponents who have fought to keep the structures The National Historic Trust and SHPO who won't be able to participate in any fight for reconstruction because of the loss of historical value.
- 2. Eliminated the historic tax credit, which will dramatically increase the costs for any public/private partnerships.
- 3. Raised the bar so high in requiring reconstruction as a last resort only, and only with written approval of the Director after review in the Washington Office, that the Wonderland would most likely not happen.
- 4. Without the Wonderland, its restaurant, registration office, and other features, a concessionaire/or Park would struggle to provide a quality stay and experience for guests/visitors. Stays would become less economically feasible from a management perspective.

There would be no "central" gathering place for educational, environmental and history programs for the public. Keeping all 50+ the cabins and the Wonderland Annex and expanding the Appalachian Club as a restaurant/dining hall would become a necessity.

If the Wonderland goes, then most likely everything goes.

Close Out Questions and Answers Concerns

#1 I strongly disagree with the phrase:

"poor quality construction and long-standing neglect". The Wonderland, built in the Arts and Crafts style of architecture almost 100 years ago, was built of local materials, by local craftsmen To keep the Little River Railroad economically profitable and to accommodate the rapidly increasing numbers of visitors to this beautiful area which was not yet a Park, a large, simple design was needed in this era of logging, railroads and the rapid expansion of our young country

This Hotel was a busy, rustic, low impact, effectively operating public facility until 1992. I can think of no structure anywhere that would look very impressive after a decade's worth of rainfall coming through unrepaired holes in the roof and wide open access to any vandal looking to destroy. The Wonderland's failure occurred this past decade under park stewardship.

- #2 Under NPS Director Order 28: Does this director realize that currently, unlike other large National Parks, the Smokies has no overnight facilities for the handicapped, elderly or young or large families with multiple members with varying levels of "camping" expertise. This Park does have accommodations for hikers at LeConte Lodge, camping in the campgrounds and educational groups at Tremont.
 - #3 I would like clarification of the terms of HABS and PMIS.

#4 No roof, no structure. As a manager of two farms with numerous barns and out buildings, I learned years ago the basic truth of <u>always</u> fixing or replacing any leaky roof as soon as possible. It is inconceivable to me that the Wonderland and the majority of cabins have been allowed to decay because of failed roofs from falling trees for the past decade. What a simple, relatively inexpensive option of stabilization while decisions are being made. Signs and fences protect the public, a dry roof protects the resource.

#5 How ironic that "remote location(not close lodging)" is one of the factors driving up the cost of the restoration/reconstruction of Elkmont! If the Wonderland or the cabins had been maintained, there would be plenty of lodging for the workers. Just how far is "remote"? Gatlinburg is only 6 miles away from this site.

Updated Alternatives Questions

The option of "Remove or Reconstruct" the Wonderland in new Alternatives C, D, E, and F represents a "lose-lose" option for those hoping to save the Wonderland for public use. Why would any of the preservationists want to willingly select "Remove" as our favored option? The "Remove" option belongs on Alternative A or B.

Alt. C, D, E, F should read "Preserve, Rehabilitate, Restore or Reconstruct" depending on the final decision of the Director and the Park. Rehabilitation may be necessary for ADA requirements, scientific equipment purposes, safety codes or educational facilities.

Such a major point of importance, keeping or destroying the Wonderland, should not be coupled in one option.

In the Park's October issue of the <u>Resource Management and Science Weekly</u>, referring to souvenir hunters in the Park, Historian David Chapman concludes, "Remember, cultural property is a non renewable resource, and cannot be replaced... losses(sic) take away from the history of the Park."

Thank you for letting me express my thoughts on this important issue.

Lynn Frierson Faust Elkmont Preservation Committee 11828 Couch Mill Road Knoxville, TN 37932 (865)690-2852 TNLFaust@cs.com

The Mission of the Elkmont Preservation Committee:

- To **preserve** the history, structures and cultural story of the Great Smoky Mountains' community of Elkmont.
- To **educate** and encourage the public to experience the Elkmont Historic District by utilizing this community in its original historical context: as a place of fellowship, retreat, renewal and recreation.
- To further the understanding of the public's role as stewards of our most precious public
 inheritance our National Parks.

APPENDIX C

YOUR HELP NEEDED TO REMOVE THE ELKMONT STRUCTURES

YOUR HELP NEEDED TO REMOVE THE ELKMONT STRUCTURES

The General Management Plan (GMP) provides for the removal of all of these structures and the return of the area to a natural state. Alt. A also provides for removal of all of the structures.

TELL THE NPS THAT IT SHOULD IMPLEMENT THE "NO ACTION ALTERNATIVE" OR "ALT. A" TO REMOVE ALL OF THE STRUCTURES AS PROVIDED BY THE GMP

Former lease holders agreed to a termination of their leases at the end of 1952 and then reneged on their agreement. Using political connections the leases were extended 20 years, until 1972. In 1972 they reneged again, and using political connections, the leases were extended until 1992 except for 4 leases which were extended to Dec. 31, 2001. In this agreement the lease holders agreed that they would not pursue any further extension of their leases. They reneged on this agreement.

In preparing the GMP, the historical significance of these buildings was reviewed. In an agreement of June 2, 1980 between the NPS and the Elkmont Preservation Committee, the Appalachian Club and the Wonderland Club, it is stated ... "A determination has been made by the Park Historian, Regional Historian and Regional Historical Architect, that no historical significance is attached to this area.". This document also states "Notwithstanding any other provision of said agreement of July 17, 1972, to the contrary, it is agreed as follows: (a) All rights to any structure or privilege within the Elkmont area subject to any lease will be terminated on December 31, 1992, except four which will expire December 31, 2001. No special consideration will be given to any existing lifetime leaseholder."

In the 1980s, as the termination date for the leases approached the lease holders reneged on both agreements and made extensive efforts through political connections, including meeting with the Sect. of Interior, to get another 20 year extension of the leases. This failed.

In a document dated June 28, 1988 the Elkmont Preservation Committee (EPC), now representing all of the lease holders, it is stated, ... "The purpose of this letter is to propose an extension of twenty years to the term of the current Elkmont Preservation Committee Lease executed in 1972 (the "Old Lease"). In consideration for such an extension, as will be more fully set out hereinafter, the Elkmont Preservation Committee would propose to donate the sum of \$770,000 in cash this year to the National

Park Service for the purpose of supporting the design and construction of the proposed Occonaluftee (sic) Visitor center."... This failed. A bribe?

Trying to get another 20 year lease, the EPC used their political connections to get the Tennessee Historical Preservation Commission to designate the area as an historic district. A political decision does not make a historical district out of an area that is clearly not of any national historical significance.

Elkmont was not the birthplace of the Great Smoky Mountains National Park. Read the history. Commercialization of a national park is an extremely inappropriate use of a national park. Read the law and consider the commercialization of land adjacent to the Smokies.

Funds paid from commercial activities in national parks go to the U. S. Treasury to be used for whatever purpose the Congress decides. The amount of funds received from a national park's concessionaires fees is not a factor when the Congress makes appropriations for that park.

Claims are made that the structures could be renovated with the ... "many sources of funding available for well-though-out projects". If these funds are so readily available, why aren't those who pretend to be interested in the preservation of historic structures obtaining these funds for use to preserve the truly historic structures in Cades Cove and other places in the Smokies.

Persons who make these claims have no idea of how many tens of millions of dollars would be required to completely rebuild the old collapsing hotel from the ground up as would be necessary, renovate some structures, and completely rebuild others, completely rebuild the sewer system, the electrical system, the water system, upgrade the roads and make the access to these structures comply with the American disabilities act. Furthermore the Little River that flows through this area is a Tier III stream and no additional polluting discharges can be made into this stream.

Submit your comments at the meeting or within the comment period (to April 7) to Superintendent, GRSM, 107 Headquarters Rd., Gatlinburg, TN 37738 or email <grsm_superintendent@nps.gov>

Ray Payne, Conservation Committee Chairman, Smoky Mountains Hiking Club